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CALIFORNIA



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## NARRATIVE INFORMATION SHEET: CITY OF LOS ANGELES RIVER PARK CLEANUP GRANT

<b>1. Applicant ID</b>	Citywide Brownfields Program, City of Los Angeles Department of Public Works, Bureau of Sanitation and Environment (LASAN)	
<b>2. Funding Requested</b>	<b>a. Grant Type:</b> Single Site Cleanup <b>b. Federal Funds Requested:</b> \$500,000 ( <u>no</u> cost share waiver is requested) <b>c. Contamination:</b> Hazardous Substances	
<b>3. Location</b>	City of Los Angeles, County of Los Angeles, State of California	
<b>4. Site Information</b>	River Park, 2850 Kerr St., Los Angeles, CA, 90039, Council District 1	
<b>5. Project Contacts</b>	<b>Project Director</b>	<b>Chief Executive</b>
Name and Title	Nuna Tersibashian, Citywide Brownfields Program Manager (Project Director), LASAN	Enrique C. Zaldivar, Director and General Manager, LASAN
Address	1149 S. Broadway, 5 <sup>th</sup> Floor, (Mail Stop 944) Los Angeles, CA 90015	1149 S. Broadway, 9 <sup>th</sup> Floor Los Angeles, CA 90015
Phone Number	(213) 485-3791	(213) 485-2210
Email Address	<a href="mailto:nuna.tersibashian@lacity.org">nuna.tersibashian@lacity.org</a>	<a href="mailto:Enrique.zaldivar@lacity.org">Enrique.zaldivar@lacity.org</a>
<b>6. Population</b>	3,999,759 (City of Los Angeles; American Community Survey, 7/1/2017)	

*zero waste • one water*

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### Other Factors Checklist

Other Factors	Page #
Community population is 10,000 or less.	N/A
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The proposed brownfield site(s) is impacted by mine-scarred land.	N/A
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/redevelopment; secured resource is identified in the Narrative and substantiated in the attached documentation.	Narrative Page #s 2-3 and Narrative Attachment A
The proposed site(s) is adjacent to a body of water (i.e., the border of the site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	Narrative Page #1
The proposed site(s) is in a federally designated flood plain.	Narrative Page # 1
The redevelopment of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	Narrative Page # 2 (use of solar LED lights)

N/A = not applicable



**Jared Blumenfeld**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Meredith Williams, Ph.D.  
Acting Director  
9211 Oakdale Avenue  
Chatsworth, California 91311



**Gavin Newsom**  
Governor

January 18, 2019

Ms. Noemi Emeric-Ford  
Land Revitalization Coordinator  
US Environmental Protection Agency  
Southern California Field Office  
600 Wilshire Boulevard, Suite 1460  
Los Angeles, California 90017

### DTSC LETTER OF SUPPORT FOR CITY OF LOS ANGELES RIVER PARK PROPOSAL TO US EPA FOR FISCAL YEAR 2019-2020 BROWNFIELD CLEAN-UP GRANT

Dear Ms. Emeric-Ford:

The California Department of Toxic Substances Control (DTSC) has lead regulatory responsibility for investigating and remediating hazardous substances release sites in California. Through various initiatives, DTSC works cooperatively with both local agencies and private entities to foster Brownfields redevelopment through investigation and remediation of blighted areas, while safeguarding the public health and the environment.

The River Park (Site) is a collaboration with 60 stakeholders to facilitate its redevelopment, including 16 city departments, 19 other governmental agencies, and 26 non-governmental interest groups. The City of Los Angeles Department of Public Works, Bureau of Sanitation (City) partners with a community consulting team of three organizations, Mujeres de la Tierra (non-profit), Friends of the LA River (non-profit) and Greater Cypress Park Neighborhood Council. The Site is a component of Los Angeles River Revitalization Master Plan and is also described in the U.S. Army Corps of Engineers (USACE) Los Angeles River Ecosystem Restoration (LARER) Integrated Feasibility Report. DTSC fully supports the application submitted by the City for a Brownfields Clean-Up Grant funded by US Environmental Protection Agency (US EPA) to remediate hazardous substances at the Site located on San Fernando Road, in the County of Los Angeles.

The Site is composed of approximately 12.5 acres and located within the 42-acre former Taylor Yard rail maintenance yard acquired by the City in 2017. It is adjacent to the Los Angeles River the Rio de Los Angeles State Park, California State Parks Parcel (Bowtie), and Sonia Sotomayor Arts and Sciences Academies, a high school serving the local community. Additionally, there are 10 nearby schools that would utilize an open space area.

CalEnviroScreen, a mapping tool identifying pollution and population characteristics provides a score of 96-100% for the area surrounding the Site, which indicates a high level of pollution burden on the population.

The City plans to create a public green space, a recreational area, and restore the ecological habitat. The City's proposal for the amount of \$500,000 will be utilized to implement the clean-up of lead, arsenic, volatile organic compounds (VOCs), such as tetrachloroethylene, and semi-VOCs, such as naphthalene. The City will be evaluating the following remedial alternatives, among others: (1) selective hotspot removal, (2) installation of an engineered cap, and (3) installation of vapor mitigation systems for any shelters or park structures.

DTSC fully supports the City's efforts to apply for and obtain a \$500,000 Brownfields Clean-Up Grant to remove hazardous substances from the Site. Awarding this grant would assist with the environmental restoration efforts and revitalize the surrounding area.

We appreciate the opportunity to provide our support for this crucial funding. If you have any questions, please contact me at (818) 717-6563.

Sincerely,



Jessy Fierro  
Senior Environmental Scientist  
Site Mitigation & Restoration Program  
Department of Toxic Substances Control  
Chatsworth Office

## 1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

**1.a.i. Target Area and Brownfields/Background and Description of Target Area:** The City of Los Angeles (LA; the “City”) grew into an industrial center in the late 1800s when several railroads selected it as their western terminus. In 1892, oil was discovered in what is now Downtown LA, and later throughout other areas of the City. During World War II, LA was a center for production of aircraft and war supplies, and after the war, the economy continued to boom with significant growth in aircraft-related industries, oil production/refining, and auto manufacturing. By 1958, the LA Metropolitan Area ranked as the second largest manufacturing center in the US, with 16,910 manufacturing establishments and with nearly 725,000 total manufacturing employees. However, beginning in the 1970s, the larger industrial facilities gradually left the City, and the decline in manufacturing has continued to this day. Since 1990, the number of LA residents employed in manufacturing has declined by 47% (from 307,874 to 163,169)<sup>1</sup>. Much of the industrial and oil production activities occurred prior to the era of environmental regulation, and the closure of these facilities has resulted in the presence of thousands of brownfield sites polluted from past industrial and oil production activities.

The River Park site (“River Park” or the “Site”) for which Environmental Protection Agency (EPA) Brownfield Cleanup funding is being sought is a former railyard bordering the LA River located within the Greater Cypress Park neighborhood 3 miles northeast of downtown LA. Neighborhood areas within a 2- to 3-block radius of the Site are filled with modest homes constructed on small lots beginning in the 1920s (many of which originally served as homes for railyard workers). Over 10,000 residents (93.1% minority) live in the three census tracts (CTs) and 0.6 square mile area directly bordering the Site. The per capita income of \$16,182 for this neighborhood is less than half that for California (CA)<sup>2</sup>. The Grant will be used to clean up the Site as the next step in transforming it from a major source of blight into a park that will serve as an exceptional community and LA River watershed asset.

**1.a.ii. Description of the Brownfield Site:** The Site encompasses 12.5 acres within a 42-acre former railyard property (Taylor Yard) acquired by the City in 2017. The River Park development is part of on-going efforts by the City to transform the entire former railyard into a combined public green space, recreational amenity, and restored habitat area. Cleanup of the Site is critical in being an area of the former railyard with some of the highest contamination levels, as well as an area critical to a key community goal of achieving “early access.” Redevelopment of the Site and the former railyard property as a whole, in turn, are key components of the “LA River Ecosystem Restoration” (LARER) project being undertaken by City and US Army Corps of Engineers (USACE) to restore 11 miles of the LA River.

**The Site includes 1,350 feet of frontage along the east bank of the LA River and its western edge lies within a federally designated flood plain.** The Site was first developed and used as a railyard in the 1930s, and was occupied by railroad tracks, storage tanks, and various other railroad support facilities. Use of the Site by the railroad first declined in the 1960s, and further declined in 1985 when use as a switching facility ended. The railyard closed in 2006, and by 2011, all buildings and railyard facilities had been demolished or removed. The Site sat vacant until purchased by the City in 2017 (following completion of an All Appropriate Inquiry [AAI] compliant Phase I environmental site assessment [ESA]) after which a fence was installed around the perimeter of the Site to secure it until it could be assessed, remediated, and made safe for public use. In 2018 a Voluntary Cleanup Program (VCP) agreement was executed by the City with the California (CA) Department of Toxic Substances Control (DTSC).

During 1985-2014, environmental investigations were conducted at the Site by the former owner to assess contamination in soil, groundwater, and soil vapor. In 2018, a comprehensive Remedial Investigation (RI) was completed by the City for the entire 42-acre former railyard property (including the Site) under the VCP to provide data needed to support the planned conversion from industrial to recreational and habitat land uses. The RI included collection and analysis of samples from over 55 locations at the Site. Two primary contaminants of concern (COCs) were documented for soil gas: tetrachloroethylene (PCE) and vinyl chloride (VC) concentrations exceeded the residential or commercial screening levels (RSLs or CSLs) in 20% of the Site area. Key COCs documented in soil include lead, total petroleum hydrocarbons (TPH), naphthalene, PCE, and benzo(a)pyrene. Approximately 10% of the Site

<sup>1</sup> Manufacturing employment: 1990 = US Decennial Census; 2017 = American Community Survey (ACS) 5-year estimate for 2013-17. Data for the City were downloaded from Social Explorer website on 1/4/19.

<sup>2</sup> Census Tract Nos. 1852.03, 1853.10, and 1853.20. Minority and per capita income = ACS 5-year estimates (2013-17)

Select acronyms: ACRES = Assessment, Cleanup, and Redevelopment Exchange System; BOE = LA Bureau of Engineering; CT = census tract; DTSC = Department of Toxic Substances Control; EPA = Environmental Protection Agency; ESA = environmental site assessment; LA = Los Angeles; LASAN = LA Bureau of Sanitation and Environment; M = million; MRCA = Mountains Recreation and Conservation Authority; RAP = remedial action plan; SCC = State Coastal Conservancy; VCP = Voluntary Cleanup Program

has leachable lead concentrations in buried soil that exceed the threshold value for characteristic hazardous waste. Previous studies have documented the presence of volatile organic compounds (VOCs) in groundwater throughout much of the Site; however, the impacts are attributed to a regional VOC groundwater plume and VOC sources located upgradient of the Site. The RI was completed in accordance with DTSC approved work plans and the RI findings and report that will guide cleanup decisions for the Site have been submitted to DTSC for review.

**1.b.i. Revitalization of the Target Area/Redevelopment Strategy & Alignment w/ Revitalization Plans:**

River Park will provide an array of public uses and benefits, including public green space, recreation, restored natural habitat, river access, and improved stormwater management. Detailed plans for reuse are being refined in conjunction with the preparation of a Feasibility Study (FS)/Remedial Action Plan (RAP) to be submitted to DTSC for approval. Three initial design concepts for the Site were developed in 2018 and submitted for public review based on initial input from stakeholders. All of the concepts include development at the Site with a combination of “water” features (boathouse, kayak launch, river steps, demonstration wetlands and expanded LA River channel), “ecological” features (native habitat, native plant nursery, habitat towers and native meadow), and “experience” features (picnic areas, outdoor classrooms, nature center and/or river museum, greenhouse, and a pedestrian bridge over the rail corridor to connect the Site to the Rio de Los Angeles State Park east of the tracks).

Development of River Park represents the culmination of a more than 30-year effort by the City and other project partners to acquire the Site and convert it to public use. River Park is a key project (#165) identified in the City’s 2007 LA River Revitalization Master Plan and will help advance 17 of 18 revitalization goals for the River identified in the Plan. The project will also advance a goal identified in the City’s 2015 Sustainable City Plan of completing 32 miles of new public access to the River by 2025. Development of River Park is also a cornerstone project of the ~\$9 million (M) LARER FS being undertaken by the USACE in partnership with the City to restore the natural and hydrological processes within an 11-mile segment of the LA River. Although labeled as a “study” the LARER FS was formally adopted by the City in 2016 and serves as a key LA River revitalization plan.

**1.b.ii. Outcomes and Benefits of Redevelopment Strategy:** The EPA Grant will transform a blighted railyard into River Park, an extraordinary regional park providing an array of recreational opportunities and ecological benefits. The EPA Grant will help achieve a priority goal of neighborhood residents for obtaining access to the River (none currently exists) as well as “early access” to portions of the Site where it is feasible to complete remediation on an expedited basis. None of the planned public uses will be possible without a comprehensive cleanup due to the significant levels of contamination present in soil gas and surface and near-surface soil throughout the Site. The project will also provide significant environmental benefits in terms of habitat restoration, flood management, and improved stormwater management. **Energy efficient lighting** (i.e., solar-powered LED lights) will be installed along trails and in parking areas, as is the standard practice for new parks developed by the City.

**1.c.i. Strategy for Leveraging Resources / Resources Needed for Site Reuse:** The City has secured several sources of funding that are being used to advance the planning, assessment, cleanup, and revitalization strategy for the Site. The initial planning and RI completed in 2018, as well as the FS/RAP to be completed during the first half of 2019, were/are being funded through a \$2M State Coastal Conservancy (SCC) grant awarded to the City in 2017. The grant can be used (as match) to help fund a portion of outreach and remedial planning activities for Tasks 1 and 2 (see Section 3.b). The City is obtaining proceeds from the sale of a multipurpose easement for the Site to the Mountains Recreation and Conservation Authority (MRCA)<sup>3</sup>. **The City will retain ownership of the Site in perpetuity**, but the sale in Spring 2019 will provide \$6,952,770 in funding for the project. The City is in the final steps of approving \$1,035,000 in Capital Improvement Expenditure Program (CIEP) funds to support assessment, remediation, and redevelopment of the Site<sup>4</sup>. The EPA Grant will facilitate access to MRCA funding, as a key requirement for sale of the easement is that surface soil achieve a non-industrial cleanup standard by 2024.

**1.c.ii. Use of Existing Infrastructure:** As a former railyard, there is limited infrastructure within the boundaries of the Site that is suitable for reuse, and all pavement and most existing underground utilities will need to be removed as part of site cleanup and to prevent abandoned utilities from serving as

<sup>3</sup> Documentation for the easement agreement is available on-line in LA [City Council File 13-1641-53](#)

<sup>4</sup> Documentation for the CIEP funding is available on-line in LA [City Council File 14-1158-S5](#).

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conduits for subsurface migration of contaminants. However, the project will serve a key role in enhancing use of existing infrastructure within the surrounding neighborhoods by providing key connections for the City's bike and trail system. The Site will have a connection to the other side of the LA River via a new \$19M 400-foot long pedestrian and bikeway bridge which is being constructed using LA County Metropolitan Transportation Authority (Metro) funding, as well as a separate pedestrian/bike bridge to be constructed across the rail lines bordering the eastern edge of the Site (connecting the Site to Rio de Los Angeles State Park). The City will seek funding to construct the bridge over the rail lines from at least three eligible funding sources<sup>5</sup>.

## 2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

**2.a.i. Community Need / The Community's Need for Funding:** The grant will be used to help meet the needs of a low-income community lacking the initial sources of funding to advance the project without assistance from EPA. The neighborhood bordering the Site is a low-income community with a per capita income that is about half that of the City, County, State and US, and the unemployment and family poverty rates are approximately double the corresponding rates for the US (Table 1).

**Table 1. Economic Distress Data (American Community Survey [ACS] 2017 5-Year Estimates<sup>6</sup>)**

Data Type	Target Area Census Tracts <sup>A</sup>	City of LA	LA County	State of CA	United States
Median Household Income <sup>B</sup>	\$41,864	\$54,501	\$61,015	\$67,169	\$57,652
Per capita income <sup>B</sup>	\$16,182	\$31,563	\$30,798	\$33,128	\$31,177
Unemployment rate <sup>C</sup>	8.8%	5.3%	5.0%	4.8%	4.1%
Poverty rate for families	19.6%	16.1%	13.2%	11.1%	10.5%

A) Combined data for CTs 1852.03, 1853.10, and 1853.20. B) In 2017 inflation adjusted dollars. C) Civilian population in labor force ≥16 years.

The City faces daunting financial challenges, with annual pension costs having more than doubled since 2005-06 (increasing from \$435M to \$1.085 billion [B] in 2017-18). The City is experiencing enormous costs associated with what is currently the greatest homeless population challenges of any US City, which, since 2013, has increased by 49% to an estimated 58,000 individuals. Of the City's budget for 2018-19, \$430M is being allocated to address homelessness. This comes after County voters approved a \$1.2B bond measure for 10,000 housing units for the chronically homeless and a 0.25% sales tax increase for 10 years beginning in 2017 that will provide an additional \$355M annually for homeless programs.

**2.a.ii Threats to Sensitive Populations / (1) Health or Welfare of Sensitive Populations:** As shown in Table 2 below, over 93% of residents in the Target Area census tracts are minorities, and over 84% are Hispanic. There is also a greater relative percentage of children ≤5 years old and women of child-bearing age in the Target Area, versus the City, County, State or US. Over 44% of adults lack a high school education and 21% of residents lack health insurance.

**Table 2. Sensitive Populations in the Target Area (ACS 2017 5-Year Estimates<sup>7</sup>)**

Data Type	Target Area Census Tracts <sup>A</sup>	City of LA	LA County	State of CA	United States
Minority residents (% of total population) <sup>B</sup>	93.1%	71.6%	73.5%	62.1%	38.5%
Hispanic residents (% of total population)	84.1%	48.7%	48.4%	38.8%	17.6%
Children ≤ 5 years (% of total population)	6.6%	6.2%	6.3%	6.4%	6.2%
Woman 16-45 years (% of total population)	23.7%	22.8%	21.6%	20.7%	19.8%
Adults (≥25 yrs) without a high school degree	44.2%	21.8%	23.6%	17.5%	12.7%
% of Housing built 1979 or earlier/1949 or earlier	88.0%/65.9%	76.5%/30.5%	75.0%/25.4%	60.3%/15.3%	54.4%/17.5%
% Residents w/ no health insurance	21.0%	15.5%	13.2%	10.5%	10.5%

Welfare concerns in the neighborhood include the blighting influence of former industrial properties, in particular the former railyard which is by far the largest brownfield site. The grant will help convert the

<sup>5</sup> Proposition 68 funding (<https://www.wildlife.ca.gov/Conservation/Watersheds/Prop-68>); LA County Measure A (<http://rposd.lacounty.gov/2016-ballot-measure/>); and Senate Bill 1 (<http://rebuildingca.ca.gov/fact-sheets.html>)

<sup>6</sup> Notes for Table 1. Data downloaded on 1/12/19. All data are 5-year estimates for 2013-17.

<sup>7</sup> Notes for Table 2. Data downloaded on 1/12/19 from the US Census Bureau website. All data are ACS 5-year estimates for 2013-17. A) Data for the Target Area are combined data for CTs 1852.03, 1853.10, and 1853.20. B) Calculated by subtracting the reported census values for "white, not Hispanic" from 100%.

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Site from the largest source of blight to a multi-faceted community amenity.

**2.a.ii (2) Greater Than Normal Incidence of Disease and Adverse Health Conditions:** Table 3 summarizes data for ten chronic disease and health indicators for the three primary census tracts within the Target Area versus the City, based on estimates developed by the Centers for Disease Control and Prevention (CDCP) and published in 2018<sup>8</sup>.

**Table 3. Health Measure Estimates for Target Area Census Tracts (CTs)<sup>9 A</sup>**

Health Measure (see footnote 9 at bottom of this page for explanation of notes A-F)	Prevalence in Target Area CTs <sup>B</sup>	Average Prevalence in LA <sup>C</sup>	Percentile among LA CTs <sup>D</sup>	Health Measure	Prevalence in Target Area CTs <sup>B</sup>	Average Prevalence in LA <sup>C</sup>	Percentile among LA CTs <sup>D</sup>
High Blood Pressure <sup>E</sup>	28.6%	26.9%	71.4%	Kidney Disease <sup>E</sup>	3.6%	2.9%	82.8%
Cancer (excluding skin) <sup>E</sup>	4.1%	4.8%	40.6%	No Leisure Time Physical Activity <sup>E</sup>	29.9%	22.7%	78.0%
Asthma <sup>E</sup>	8.7%	8.5%	63.3%	Poor Mental Health <sup>F</sup>	15.0%	13.1%	71.1%
Diagnosed Diabetes <sup>E</sup>	13.2%	10.4%	80.4%	Obesity <sup>E</sup>	30.6%	26.3%	73.4%
High Cholesterol <sup>E</sup>	36.0%	32.8%	89.8%	Poor Physical Health <sup>F</sup>	16.4%	13.0%	78.7%

The Target Area scores worse (i.e., has higher prevalence percentages) for 9 of the 10 health measures than the City as a whole, and generally ranks in the bottom 20-30 percent for each measure (relative to LA census tracts). Lead poisoning data were not provided by CDCP, but are available for all zip code areas for 2012<sup>10</sup>. The Site lies in the 90039 zip code for which 3.1% of children <6 years old had blood lead levels of ≥4.5 micrograms per deciliter (indicative of lead poisoning). This rate of lead poisoning is the 17<sup>th</sup> highest of 164 total zip code areas in LA, and is likely attributable in part to the high percentage (88.0%) of housing built prior to 1980 (and therefore prone to contain lead-based paint).

**2.a.ii (3) Economically Impoverished/Disproportionately Impacted Populations:** Sensitive populations in the Target Area are at a higher risk of being exposed to a variety of cumulative pollution sources. EPA's EISCREEN Tool was used to evaluate the three primary CTs in the Target Area for 11 environmental justice indices<sup>11</sup>. The CTs ranked in the 90<sup>th</sup> to 99<sup>th</sup> percentile among CTs in the US for all 11 indices, indicating a disproportionate burden and vulnerability to multiple sources of contamination. A similar type of analysis is provided for all 8,035 California census tracts on the CalEnviroScreen website, with CT 1853.20, 1852.03, and 1853.10 ranked in the 99.4, 94.0, 89.0 percentiles, respectively<sup>12</sup>.

**How the Grant Will Serve to Address (or Identify) and Reduce Threats:** The grant will help to advance cleanup of the Site and its transformation from a major source of blight to a major community asset that will provide enhanced opportunities for recreation, as well as serve a tranquil oasis and place of beauty. Lead is one of the major contaminants at the Site and represents a potential threat to children in the area who are already experiencing higher levels of lead poisoning. The project will remove or cap areas of lead-impacted soil, and the cap and landscaping will eliminate the Site from serving as a source for contaminated dust (a major concern expressed by area residents at public meetings). The recreational amenities will help to reduce the disproportionately high numbers of residents who suffer from poor mental health, poor physical health, obesity and low levels of physical activity.

**2.b.i Community Engagement / Community Involvement:** Over 60 stakeholders have been involved in the project to date. Information for three key local community partners is provided below.

Group Name	Mujeres de la Tierra (MdIT)	Friends of the LA River (FOLAR)	Greater Cypress Park (GPC) Neighborhood Council (NC)
Contact Info	Irma Munoz, 323-350-3306, <a href="mailto:irma.munoz@mujeresdelatierra.org">irma.munoz@mujeresdelatierra.org</a>	Stephen Mejia, 323-223-0585, <a href="mailto:smejia@folar.org">smejia@folar.org</a>	David Travis, <a href="mailto:travisNela@gmail.com">travisNela@gmail.com</a>

<sup>8</sup> <https://chronicdata.cdc.gov/500-Cities/500-Cities-Census-Tract-level-Data-GIS-Friendly-Fo/k86t-wqhb/data>

<sup>9</sup> Notes for Table 3. A) Data accessed from the CDC website on 1/10/2019. B) The target area CTs include 1852.03, 1853.10, and 1853.20. C) Average of values for all 994 LA CTs. D) Ranking of the average value for the target area CTs of 994 LA CTs. A percentile value of 71.4% means that the prevalence in the target area CTs is higher (worse) than that in 71.4% of all LA CTs. E) Model-based estimate for crude prevalence among adults aged ≥ 18 yrs, 2016. F) Crude prevalence of mental or physical health not good for ≥14 days among adults aged ≥18 yrs, 2016.

<sup>10</sup> [https://www.cdph.ca.gov/Programs/CCDCPHP/DEOD/CLPPB/CDPH%20Document%20Library/zip\\_code\\_2012\\_250\\_tested.pdf](https://www.cdph.ca.gov/Programs/CCDCPHP/DEOD/CLPPB/CDPH%20Document%20Library/zip_code_2012_250_tested.pdf)

<sup>11</sup> Source: <https://www.epa.gov/eiscreen> Accessed 1/23/2019. EISCREEN Report for LA CTs.1852.03, 1853.10 and 1853.20,

<sup>12</sup> <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>

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Group Name	Mujeres de la Tierra (MdIT)	Friends of the LA River (FOLAR)	Greater Cypress Park (GPC) Neighborhood Council (NC)
Description	Both <b>MdIT</b> and <b>FOLAR</b> are part of the project outreach team; responsible for assisting the Project Management Team with community outreach through: building local contact lists; providing information sheets, public notifications, presentations and materials for community meetings; and organizing, staffing, promoting and planning outreach efforts and public meetings.		<b>GPCNC</b> is one of 96 neighborhood councils. It serves ~13,400 residents living within a 1.3-sq. mile area that includes the Site. Representatives from <b>GPCNC</b> (as well as four other NCs in proximity to the Site <sup>13</sup> ) serve on the Community Leadership Committee. All have meaningful involvement in decisions related to future cleanup and redevelopment of the Site and help to inform the design team of concerns specific to their neighborhoods (and potential solutions to addressing these concerns).
	<b>MdIT</b> is a public health and wellness organization based in the Greater Cypress Park neighborhood, and has additional responsibilities for providing Spanish language translation for the project. <b>MdIT</b> performs outreach to small groups and relay concerns and desires to the design team.	With over 100,000 members, <b>FOLAR</b> effectively conducts outreach to the broader "LA River community" as well as relays their concerns and desires to the design team.	

**2.b.ii. Incorporating Community Input:** The City communicates progress and solicits input on the project in accordance with a Public Engagement Plan (PEP) completed in 2017. A key component of the PEP was the creation of two advisory stakeholder committees: (1) a Technical Advisory Stakeholder Committee (TASC) composed primarily of technical experts and representatives from stakeholder agencies and governmental entities, and (2) a Community Leadership Committee (CLC) composed of representatives from neighborhood organizations, community groups, and schools. The TASC and CLC meet on a quarterly basis, and will continue to do so as the remedial planning and park design process is completed. The initial meetings for the TASC and CLC were held on 12/6/2017, followed by an initial outreach event on 1/20/2018 that attracted over 200 participants, followed by a community design workshop on 1/24/2018 with over 300 participants that was conducted to solicit input on design components and implementation strategies. The City also conducted a public survey in March 2018 with over 1,300 responses to obtain input on preferred features, use, and amenities at the Park. These were incorporated into three initial design alternatives presented to the public in 2018 for further input.

Methods used to communicate progress and solicit input include public meetings, a dedicated project website (<http://www.tayloryardg2.com/>), fact sheets, mailers, on-line surveys, and door-to-door canvassing of residents. All presentations are made available on the project website, and detailed quarterly reports are posted that summarize completed or scheduled activities, funding sources secured or identified, and outreach activities performed. All environmental data and reports for the Site are available to the public on the DTSC EnviroStor website<sup>14</sup>. The methods for communicating project progress to the community have been adjusted specifically in response to feedback from the community over the past 22 months, so that a greater emphasis is being placed on door-to-door canvassing, and an expansion of the areas to receive mailed notifications of site work to a 3-mile radius.

### 3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

**3.a. Proposed Cleanup Plan:** Cleanup of the Site will include a combination of remedial alternatives as described under Alternative 8 in the draft Analysis of Brownfields Cleanup Alternatives (ABCA). Excavation, removal, and off-site disposal of contaminated soil will be performed strategically in hot spot areas prioritized for removal based on the FS/Final RAP. In select hotspot areas, on-site treatment may be performed on soil that is characteristically hazardous for lead to reduce leachable lead concentrations as necessary to enable the soil to be disposed as a non-hazardous waste. Capping of contaminated soil will be performed as necessary to accommodate the planned use of the Site as a public greenspace and recreational area. Soil vapor mitigation measures will be used as part of construction of a nature center/river museum or any other park buildings constructed in areas where contaminants in soil vapor represent a potential vapor intrusion concern. Phytoremediation may also be incorporated into final remedial plans for select areas. The exact locations for use of each alternative will be subject to further public input regarding plans for cleanup and development of the Site, the timing and amounts of various

<sup>13</sup> Glassell Park NC, Elysian Valley NC, Lincoln Heights NC, and Atwater Village NC

<sup>14</sup> [https://www.envirostor.dtsc.ca.gov/public/profile\\_report?global\\_id=19470006](https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=19470006)

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types of funding that are secured, DTSC approval, and other factors. It is anticipated that EPA Cleanup funding will be used primarily for removal of soil from hotspot areas and for cap construction needed to advance the goals of “early access” and satisfying cleanup requirements for sale of the MRCA easement. As noted in Section 1.a.ii, key contaminants in soil include lead, TPH, PCE, and benzo(a)pyrene, which exceed the residential and/or commercial RSLs or CSLs for soil in one or more locations. The most significant contaminants are lead and TPH which exceed the RSLs and/or CSLs throughout approximately 30-40% of the Site. Toxicity characteristic leaching procedure (TCLP) lead concentrations exceed the characteristic hazardous waste threshold value of 5 milligrams per liter (mg/L) across approximately 15% of the Site resulting in the anticipated need to treat some lead-impacted soil to non-hazardous levels to facilitate disposal at a Resource Conservation and Recovery Act (RCRA) Subtitle D landfill.

Anticipated grant-funded remedial activities include the excavation and removal (landfilling) of up to 2,500 tons of contaminated soil from hotspot areas, with treatment of up to 500 tons of this soil to reduce TCLP lead concentrations to non-hazardous levels. In select areas with residual contamination, a cap will be constructed consisting of a 1-foot thick layer of imported “clean” fill, covered by 6-inches of imported “clean” top soil. Budget is included for capping of up to a 100,000-square-foot area, which will then be seeded and mulched to provide an interim landscaped surface.

**3.b. Description of Tasks and Activities:** Implementation of the grant and completion of the project will be a collaborative effort between City staff in the LA Bureau of Sanitation and Environment (LASAN), the LA Bureau of Engineering (BOE), the Mayor’s Office, and City Council District 1, supported by project partners and one or more environmental contractors retained through procurement processes compliant with 2 CFR 200.317-326 requirements. The scope of work has been organized into four tasks, for which the specific activities, deliverables, and roles are summarized below. Details on the overall project schedule and on the required 20% match are provided at the end of this section.

**Task 1 – Community Involvement/Grant Management:** BOE staff (Katie Doherty and Deborah Weintraub) will continue to lead the community involvement process for the park development project, and the specific outreach that will be conducted in conjunction with preparation of a final approved RAP and performance of initial cleanup activities to be paid for through the EPA Grant. **LASAN staff** (Nuna Tersibashian supported by Colette Monell) will assist with community outreach activities through participation in meetings, but will have primary responsibility for completion of reporting and other programmatic activities required for the EPA Grant (including quarterly progress reports, annual disadvantaged business enterprise reports, property profile submission and updates on the ACRES reporting system, and final closeout reports). Grant funds will also be used to pay for travel costs for LASAN/City Brownfields Program staff (Nuna Tersibashian and/or Colette Monell) to attend two regional or national brownfield conferences to share project lessons learned and successes.

**Task 2 – Cleanup Planning:** As noted in Section 1.c.i, a draft FS/RAP is being prepared for the Site and will be submitted to DTSC for review during the first half of 2019. Following execution of the cooperative agreement, BOE will prepare a final ABCA and a detailed RAP and specifications specific to the 12.5-acre MRCA easement area. The final ABCA and RAP will be submitted to EPA and DTSC for review and approval. In addition, a quality assurance project plan (QAPP) that details all field and laboratory procedures for health and safety monitoring and collection and analysis of confirmation, treatment verification, and other types of environmental samples in conjunction with cleanup – will be prepared and submitted to EPA for review/approval. BOE (or contractors) will complete EPA required threatened or endangered species (ESA §7(a)(2)) and National Historic Preservation Act (NHPA §106) review activities, as appropriate.

**Task 3 – Site Cleanup:** BOE staff (led by Katie Doherty) will direct cleanup activities at the Site, which will be completed and overseen by qualified environmental contractors retained in accordance with 2 CFR 200.317-326. Task 3 activities will include:

- 1) BOE or LASAN will issue a work order to one of the City’s on-call contractors to perform environmental oversight, documentation, and sampling in accordance with the RAP and QAPP.
- 2) BOE will work with DTSC to provide at least one-week advance notice of remedial work to project stakeholders and residents living in areas near the Site.
- 3) BOE will retain a qualified cleanup contractor through a competitive request for proposal (RFP) process based on the RAP and specifications developed during Task 2. The contractor will:
  - a) Complete all permitting and pre-work submittals including a health and safety plan.

- b) Set-up controls to secure the Site and to comply with stormwater management requirements, and survey and stake the boundaries for planned excavation areas.
- c) Excavate, load, transport, and dispose of approximately 2,500 tons of contaminated soil from priority hot spot areas, with on-site treatment (prior to disposal) for up to 500 tons of soil to reduce TCLP lead concentrations to <5 mg/L.
- d) Placement and compaction of documented clean backfill materials to grade, followed by placement of an approximate 6-inch layer of imported clean top soil, followed by seeding and mulching of the area to provide an interim landscaped surface.
- 4) The oversight contractor will observe/document the cleanup activities, and complete:
  - a) Confirmation soil sampling to document removal of impacted soil and residual contaminant concentrations remaining at the excavation base and sidewalls.
  - b) Assist the BOE in completing a remedial documentation report.

**Task 4 – VCP Oversight:** DTSC staff will assist with outreach activities, participate in public meetings, provide review and approval of work plans and technical reports associated with Tasks 1-3. DTSC charges VCP participants for staff time required for oversight.

**Schedule:** The City expects remedial planning to be completed in March 2020. Bidding and award of contracts will occur during March 2020 through September 2020. Cleanup will be completed during September 2020 through September 2021. Additional schedule details are provided below.

Task No.	Task Name	Description	FY2020				FY2021				FY22
			Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1
1	Community Outreach/ Grant Management	Public Meetings	+		+				+		
		Fact Sheets									
		Webpage Updates									
		Quarterly Reporting									
		Annual DBE Reports									
		ACRES Updates	Property profile will be created in 1Q20 & updated as appropriate								
		Final Closeout Report									
2	Cleanup Planning	Final ABCA/RAP Preparation/Approval									
		QAPP Preparation/Approval									
		NHPA and ESA Requirements									
		Work Plan and Specifications Preparation/Approval									
3	Cleanup Activities	Cleanup Contractor Procurement									
		Soil Cleanup Activities									
		Closure Reporting									
4	VCP Oversight										

**Cost Share:** The City will meet the 20% cost share through a combination of BOE staff time spent performing outreach, project management, cleanup oversight and coordination in conjunction with implementation of Tasks 1 through 3, and work performed by consultants for Tasks 1 and 2 – but paid for through the state SCC grant or other non-federal funding sources. Estimates for BOE staff time required for each task were based on time expended on past park development projects funded in part through EPA Cleanup Grants.

**3.c. Cost Estimates and Outputs:** The project budget is summarized in the table below.

Line #		Budget Categories	Task 1	Task 2	Task 3	Task 4	Totals
			Outreach & Grant Mgmt.	Cleanup Planning	Site Cleanup	VCP Oversight	
1	Direct Costs	Personnel (LASAN)	\$5,000	\$0	\$5,000	\$2,000	\$12,000
2		Travel	\$5,000	\$0	\$0	\$0	\$5,000
3		Supplies	\$3,000	\$0	\$0	\$0	\$3,000
4		Contractual	\$0	\$0	\$450,000	\$0	\$450,000
5		Other (VCP fees)	\$0	\$0	\$0	\$30,000	\$30,000
6	Total Direct Costs		\$13,000	\$0	\$455,000	\$32,000	\$500,000
7	Indirect Costs		\$0	\$0	\$0	\$0	\$0
8	Total Federal Funding		\$13,000	\$0	\$455,000	\$32,000	\$500,000
9	Cost Share		\$25,000	\$25,000	\$50,000	\$0	\$100,000
10	Total Budget		\$38,000	\$25,000	\$505,000	\$32,000	\$600,000

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**Task 1 - Community Involvement/Grant Management (Total Budget = \$38,000):** Personnel costs of \$5,000 are requested to support performance of grant reporting activities by LASAN staff (50 hrs @ \$100/hr). Travel costs of \$5,000 are requested for LASAN staff to attend regional or national brownfield conferences and include airfare costs (2 staff; 2 conferences; \$500/ticket = \$2,000) and hotel/meal/local transportation costs (2 staff @ 2 conferences; 3 days/conference; \$250/day = \$3,000). Supply costs of \$3,000 include \$500 for printing and \$2,500 for mailing expenses associated with public notices. The cost share of \$25,000 for Task 1 will be provided through 250 hrs of work (average blended rate = \$100/hr) by BOE staff or consultants (paid through the SCC state grant) conducting outreach.

**Outputs:** 1) Outreach meetings (3 to 4 total) with notices, agendas, presentations, sign-in sheets, and meeting notes. 2) Outreach materials (fact sheets; results summary sheets; website updates with all materials prepared in both Spanish and English). 3) Quarterly progress reports, annual DBE reports, final closeout report, ACRES updates (as needed).

**Task 2 – Cleanup Planning (Total Budget = \$25,000):** The cost share of \$25,000 for Task 2 will be provided by consultants (paid through the SCC state grant or other non-federal funding sources) performing an estimated 200 hrs of work (@ \$125/hr) performing cleanup planning activities.

**Outputs:** 1) Final ABCA. 2) Final RAP. 3) QAPP. 4) ESA/NHPA Screening Documentation.

**Task 3 – Cleanup (Total Budget = \$505,000):** Personnel costs of \$5,000 are requested for coordination of cleanup activities to be performed by LASAN staff (50 hrs @ \$100/hr). Contractual costs of \$450,000 include \$10,000 for laboratory analyses, and \$440,000 for cleanup contractor costs ([1] \$20,000 for mobilization and pre-work submittals; [2] excavation/trucking/disposal of 2,000 tons of contaminated soil @ \$100/ton = \$200,000; [3] treatment of 500 tons of soil prior to disposal @ \$50/ton = \$25,000; [4] cap construction, including import of 2,500 tons of clean fill/top soil, throughout 100,000 ft<sup>2</sup> area @ \$1.70/ft<sup>2</sup> = \$170,000; [5] interim seeding and mulching of 100,000 ft<sup>2</sup> cap @ \$0.25/ft<sup>2</sup> = \$25,000). Cleanup contractor costs assume payment of prevailing wages under the Davis-Bacon Act. The cost share of \$50,000 for Task 3 will be provided through 500 hrs of work (@ \$100/hr) by BOE staff conducting oversight activities (100 hrs coordination; 200 hrs on-site oversight activities; 200 hrs report preparation).

**Outputs:** 1) Contractor RFPs and bid results, 2) Contractor Pre-Work Submittals, 3) Laboratory Testing Reports, and 4) Closure Reports.

**Task 4 – VCP Oversight (Total Budget = \$32,000):** Personnel costs of \$2,000 are requested for LASAN staff time (20 hrs @ \$100/hr) to coordinate VCP oversight activities specific to the Site. Other costs of \$30,000 are requested for hourly fees that will be charged by DTSC for time spent by DTSC staff providing oversight for cleanup under the VCP. DTSC also will assist with outreach activities, participate in public meetings, provide review and approval of work plans and technical reports associated with Tasks 1-3. DTSC fees are estimated at 300 hrs @ \$100/hr. The estimate is based on VCP charges incurred by the City on recent cleanup projects of similar complexity.

**Outputs:** 1) Outreach materials prepared by DTSC. 2) RAP approval letter. 3) Closure/NFA action letter.

**3.d. Measuring Environmental Results:** Upon notice of award, the overall park development schedule (which is maintained and updated on a weekly basis) will be updated with tasks, subtasks, milestones, and reporting requirements specific to the EPA grant, including the outputs associated with each task as detailed in Sections 3.b and 3.c. This schedule will be reviewed on at least a weekly basis throughout the project to identify deviations in schedule as soon as they occur, so that corrective measures can be developed and implemented to maintain progress. Copies of the updated schedule will be included with each quarterly progress report provided to EPA as well as posted to the project website. The high level of involvement by DTSC staff throughout all phases of assessment, public outreach, and remedial planning process will enhance the ability of DTSC to review and approve the final RAP on a timely basis.

**Environmental Cleanup Results:** The anticipated short-term cleanup results or outcomes for the project will be documented and include: 1) the quantity and mass of contaminated soil, and associated mass of individual contaminants of concern removed, 2) the quantity of soil successfully treated to reduce TCLP lead concentrations to non-hazardous levels, 3) the land area made safe for public access through hot spot removal, soil treatment, and/or cap construction.

**Redevelopment Outcomes:** The eventual long-term redevelopment outcomes that will be tracked and measured will include: 1) acres of land redeveloped for open space/parks, 2) acres of land for which

environmental issues have been resolved and made available for reuse, 3) feet of public trails or walkways created and 4) dollars of public and private funding leveraged. All outputs and outcomes completed during and after the three-year grant period will be reported and updated in ACRES.

#### **4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**4.a.i. Programmatic Capability / Organizational Structure:** The Cleanup Grant will be administered by the Citywide Brownfields Program housed in the Department of Public Works, LASAN, which has managed 10 previous EPA Brownfields Grants and is familiar with all steps and strategies necessary for timely and successful expenditure of funds, as well as the EPA Grant technical, administrative, and reporting requirements. LASAN's team includes staff from the Financial Management Division and Office of Accounting who will be processing invoices as well as providing financial administrative support.

The River Park project as a whole (including assessment, planning, design, remediation, construction, and community engagement) is being led by the LA BOE and a Project Management Team (PMT) that includes four representatives from the BOE, as well as one each from the Mayor's Office and Council District No. 1. The PMT was formed by the City in 2017 following acquisition of the Site, and has worked collaboratively over the past 22 months to manage the assessment, design, planning, and outreach activities completed to date. The PMT is supported by a Technical Advisory Stakeholder Committee (TASC) and a Community Leadership Committee (CLC) (both with over 20 representatives), as well as a Consultant Team retained through a qualifications-based procurement process in 2017 for the purpose of completing initial assessment, remedial planning, design, and community outreach for the Site (with work funded through the \$2M SCC grant awarded to the City in 2017). The existence of this established and fully functioning project organizational structure will help to ensure the timely and successful expenditure of funds, as well as the completion of all project and grant requirements. Following is a brief discussion of key project staff.

***EPA Brownfields Cleanup Grant Manager – Nuna Tersibashian, Program Manager, LA Citywide Brownfields Program, LASAN*** will manage the EPA Grant administrative and programmatic requirements. Ms. Tersibashian has a Master's Degree in environmental geology, a Bachelor of Science Degree in geology, and over 15 years of experience as an environmental professional. She has managed the LA Citywide Brownfields Program for the past 10 years including several previous EPA Brownfields Grants. Her duties and responsibilities include: applying for and administering environmental grants for the City; performing brownfield project related coordination and outreach with Council Offices, the Mayor's Office, regulatory agencies, developers, property owners, community organizations, and other stakeholders; and overseeing grant supported program activities.

***River Park Project Manager - Katie Doherty, PE, Civil Engineer, LA Bureau of Engineering (BOE)*** is a member of the PMT and is the Project Manager for the River Park project as a whole. Ms. Doherty has worked for BOE since 2006, and on the River Park project since the Site was acquired by the City in 2017. Ms. Doherty was the assistant project manager for the \$100M Machado Lake Ecosystem Rehabilitation Project completed in 2017, which included removal of 240,000 cubic yards of contaminated sediment, creation of a constructed wetland, restoration of over 40 acres of riparian habitat, and upgrading of recreational amenities (including one mile of refurbished pathways, four observation piers, two pedestrian bridges, new park fixtures, and over 50,000 new plants and trees). The scope of work and challenges for this project were similar those associated with River Park, and this experience will help in ensuring the timely and successful completion of the project.

***Deborah Weintraub, AIA, LEED AP – Chief Deputy City Engineer, LA BOE*** is a member of the PMT and is leading the design and public outreach process for River Park. She has been integral to all aspects of the City's on-going LA River revitalization effort. She is second in command at the BOE, and oversees approximately 950 staff and can ensure that all necessary staff resources are made available to ensure the successful completion of the project.

**4.a.ii. Acquiring Additional Resources:** In addition to Ms. Tersibashian, LASAN has other qualified staff with experience in managing EPA Brownfields Grants who can be assigned to the project as necessary to assure compliance with all programmatic and administrative requirements associated with the Cooperative Agreement. The City as a whole, as well as LASAN and the BOE procure millions of dollars of professional engineering and environmental services on an annual basis, and have the ability to procure and secure any additional expertise or resources necessary to implement the Grant and successfully

complete the project. The procurement process routinely used by BOE and LASAN is fully compliant with 2 CFR 200.317-326 requirements, and LASAN in the final stages of retaining qualified environmental consultants for potential use on this or other EPA-grant funded projects (“On-Call Environmental Site Assessment and Technical Support for Brownfields Program, Solicitation BAVN ID #33691”).

**4.b.i (1) Past Performance – Accomplishments:** Information on the City’s three most recent EPA Brownfields Grants is provided below.

FY2017 \$300,000 Community Wide Assessment (CWA) Grant (BF-99T55401): The City is in the final stages of procuring one or more environmental consultant(s) to assist with implementation of this grant. The Request for Qualifications (RFQ) issued in 2018 resulted in proposals from 17 consultants. Contracts with one or more consultants will be executed in early 2019.

FY2014 \$400,000 CWA Grant (BF-99T09601): To date, 12 Phase I ESAs and three Phase II ESAs have been completed. In addition, the City completed a comprehensive inventory of brownfield sites bordering the 11-mile segment of the LA River that is the focus for the \$1.3B LARER river restoration project being performed by the City in partnership with the USACE. Over 600 parcels were evaluated with over 180 sites identified as potentially eligible for brownfields funding. The Phase I and II ESAs have further advanced plans for residential or mixed-use developments on six parcels.

FY2011 \$400,000 CWA Grant (BF-00T51701): Assessment activities (including 27 Phase I ESAs and two Phase II ESAs) were completed within the Wilmington and Pacoima neighborhoods, resulting in 21 properties being made “ready for reuse.” All tasks in the work plan were completed with 79% of funding used on Phase I and II ESAs. Assessment activities helped advance the \$111M Ken Malloy Harbor Regional Park project (reopened in 2017), the widening of Alameda Street (under construction), and the creation of the Heart of Watts Community Garden (opened in 2016).

Multiple Other Grants: Of perhaps greater relevance, the City has successfully used three previous EPA Grants for redeveloping brownfield sites into parks. **Rockwell Park:** A \$200,000 EPA Cleanup Grant (FY2007) was used to develop a community park on a 0.42-acre site impacted by former oil wells, and leveraged \$155,126 in cleanup funding and \$1.9M in park development funding. **South Los Angeles Wetland Park:** A \$200,000 EPA Cleanup Grant (FY2009) helped leverage \$26M in funding used to cleanup and convert a 9-acre former bus yard into a park. The project was managed by LASAN in collaboration with BOE and was awarded an “Envision Platinum Award” from the Institute for Sustainable Infrastructure. **Albion Riverside Park:** A \$500,000 EPA Brownfield RLF Subgrant (from DTSC) leveraged \$5.5M in demolition/cleanup funding and >\$20M in park development funding to remediate and convert a 6-acre former food processing plant bordering the LA River into a park with a community center, athletic fields, walking paths, picnic areas, and green stormwater infrastructure. The project was completed by BOE in collaboration with LASAN.

**4.b.i (2) Past Performance – Compliance with Grant Requirements:** Since 1997, the City has received ten EPA Brownfields grants. During the past 21 years, all quarterly performance reports, technical reporting and ACRES reporting were acceptable and submitted on time. LASAN was compliant with all terms and conditions of all grants. Outputs and outcomes for these grants have been fully reported in ACRES.

**OPEN ASSISTANCE AGREEMENTS:** FY2017 CWA Grant (BF-99T55401; 10/1/2017-9/30/2020): As of 1/15/2019, \$300,000 in funding remains. The City is in the final stages of retaining a consultant and anticipates spending all funds within the 3-year grant period.

FY2014 CWA Grant (BF-99T09601; 10/1/2014-10/31/2019): As of 1/15/2019, approximately \$27,275 in funding remains that has not been allocated to assessments either in progress or completed (but not yet reimbursed by EPA). The remaining funds are committed via executed proposals and will be fully expended before 10/31/2019.

**CLOSED ASSISTANCE AGREEMENTS:** FY2011 CWA Grant (BF-00T51701; 10/1/2011-12/30/2017): Of \$400,000 in funding, \$2,151.82 in petroleum and \$1,482.06 in hazardous funding were not spent, due to the small residual budget amounts being less than the funding necessary to complete an additional Phase I or Phase II ESA.

## **NARRATIVE– ATTACHMENT A DOCUMENTATION FOR LEVERAGED RESOURCES**

(Provided is a news release from the State Coastal Conservancy [SCC] website announcing the award of the \$2 million SCC grant for use in assessment, cleanup, and reuse planning at the Taylor Yard property – which includes the River Park site that is the focus for the EPA Cleanup Grant).




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## State Coastal Conservancy Grants \$2 million to City of Los Angeles for Taylor Yard River Park Planning

**LOS ANGELES** – The Board of the State Coastal Conservancy, the State agency responsible for the protection and restoration of California's coast and waterways, has authorized the disbursement of up to \$2 million to the City of Los Angeles to develop the Implementation Plan for the Taylor Yard River Park on the Los Angeles River.

Taylor Yard River Park is a 41-acre parcel adjacent to the LA River in the City, just north of downtown, which will be transformed into a public greenspace. This project is one of several Los Angeles Urban Greening projects sponsored by the Coastal Conservancy that aim to create parkland for communities, restore ecosystems and enhance flood risk management throughout the City.

"I have been focused on revitalizing the LA River for the better part of a decade, including fighting for the \$25 million budget allocation that made it possible for us to acquire this parcel. We have a long way to go to realize our dream of a healthy LA river as a vibrant social and recreational center of our city, but today the future looks brighter than ever," said **California Senate President pro Tempore Kevin de León (D-Los Angeles)**

With this funding, the City will convene a project implementation team, including the Conservancy, Santa Monica Mountains Conservancy, California Department of Parks and Recreation, Metro, Metrolink, USACE, various NGOs which are conducting restoration work and implementing the seasonal recreation zone programs near the site, and representatives of elected officials. The planning effort will include:

- A plan for safe near-term public access;
- A plan for long-term access, use and management responsibilities;
- A plan for restoring native plant and wildlife habitats;
- A revised site cleanup plan;
- Public engagement and involvement, particularly from the surrounding communities;
- Three buildable, scalable, phase-able design concepts that accommodate public access, habitat restoration and compatible recreation;
- A project financing plan outlining interim to permanent use options;
- A plan for long-term operations and maintenance; and
- A plan for construction of first phase of the Taylor Yard River Park within five years.

In addition, as part of the proposed project, the City will install fencing and signage to secure the site and protect public safety during the planning process.

"We are delighted to fund this work to get the Taylor Yard restoration process moving forward", said **Joan Cardellino, South Coast Regional Manager for the State Coastal Conservancy**. "Taylor Yard will deliver so many benefits when complete – from creating

new recreation space to restoring riparian habitats to decreasing the risk of flooding. Urban Greening in Los Angeles is important for the quality of life in the City, and to preserve the natural resources of Southern California.”

In addition to local (the City) and federal (USACE) federal prioritization of the Taylor Yard area, Taylor Yard River Park is a long-standing priority of the State as indicated in the California Resources Agency’s 2001 *Common Ground Plan*, the Conservancy’s 2002 *Taylor Yard Multiple Objective Feasibility Study*, and State Parks’ 2005 *Rio de Los Angeles State Park General Plan*.

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## **THRESHOLD CRITERIA FOR BROWNFIELD CLEANUP GRANTS**

### **1. Applicant Eligibility**

The City of Los Angeles is a “general purpose unit of local government” as that term is defined in 2 CFR § 200.64 and is therefore eligible to receive a United States Environmental Protection Agency (USEPA) Brownfields Cleanup Grant. If awarded funding by USEPA, the Citywide Brownfields Program within the City of Los Angeles Department of Public Works, Bureau of Sanitation and Environment (LASAN) will administer this grant.

### **2. Previously Awarded Cleanup Grants**

The site that will be the focus of the Fiscal Year (FY) 2019 Cleanup Grant, if awarded, is named “River Park.” The Site encompasses an approximate 12.5-acre area at the north end of the larger 42-acre parcel “Taylor Yard” property purchased by the City in 2017. The Site has not received funding from a previously awarded USEPA Brownfields Cleanup Grant.

### **3. Site Ownership**

The City of Los Angeles is the sole owner of the Site. The title is fee simple. The City acquired the Site on March 1, 2017. The City intends to retain ownership of the Site on a permanent basis for public use.

### **4. Basic Site Information**

Name of Site: River Park

Site Address: 2850 Kerr Street, Los Angeles, CA 90039

Current Owner: City of Los Angeles

Grant funding, if awarded, will be used to perform remedial activities within the Site.

### **5. Status and History of Contamination at the Site**

The Site was historically part of an approximate 244-acre railyard developed by the Union Pacific Railroad Company (UPRC) and its predecessors beginning in the early 1900s. River Park is bounded on the west by the Los Angeles River and was first developed and used as a railyard in the early 1930s.

Historical aerial photographs indicate that the period from 1945 and 1952 was a time of peak activity and development at the Site. Maintenance and fueling operations continued through 2006, when the railyard was permanently closed. The former railyard was cleared of all structures and has been vacant since 2011. A six-foot tall chain link fence with locking gates was constructed around the perimeter of the Site by the City in May 2017 to secure it from public access until it could be further assessed, remediated, and deemed safe for public access by the California Department of Toxic Substances Control (DTSC). The Site currently has no active or passive uses.

Since 1985, a series of soil, soil gas and groundwater investigations have been conducted at the Site. Results of the several progressive phases of remedial investigation identified constituents of potential concern (COPCs) in the Site soil as lead, arsenic, total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), and semi-volatile organic compounds (SVOCs). VOCs are also present in groundwater beneath the Site; however, groundwater impacts are generally attributed to the regional chlorinated VOC

groundwater plume and chlorinated VOC sources located upgradient of the Site and the Taylor Yard property. VOCs have also been detected in shallow soil gas in discrete areas of the Site.

In 2018, a consultant team led by WSP completed a comprehensive Phase II Remedial Investigation (RI) of the Site. Sample collection and laboratory analysis for the Phase II RI has been completed and a draft Phase II RI Report submitted to DTSC in December 2018. As part of the Phase II RI, a 100-foot by 100-foot grid was established across the Site. Soil gas samples were collected from nearly all cells. Key COCs for soil gas at the Site include tetrachloroethene (PCE) and vinyl chloride (VC). The concentration of PCE exceeded the residential screening level (RSL) in one soil gas sample. VC exceeded the RSL in eight soil gas samples and the commercial screening level (CSL) in five samples. Overall, 11 of the 55 cells had one or more of these VOCs at concentrations that exceed an RSL or CSL. Of potential significance to the remedial action requirements for the Site is that some of these exceedances occur in the vicinity of potential future locations for a nature center or river museum as identified on preliminary concept plans for redevelopment of the Site.

Key constituents identified in soil at the Site as part of the Phase II RI include lead, total petroleum hydrocarbons (TPH), PCE, and benzo(a)pyrene, which exceed the RSL's and/or CSL's for soil in one or more soil samples. The most significant contaminants are lead and TPH which exceed the RSL in samples collected from within 22 and 24 of the 55 total cells, respectively, and which exceed the CSL in samples collected from within samples collected from within 17 and 18 cells of the 55 total cells, respectively. Toxicity characteristic leaching procedure (TCLP) tests were performed on select samples and the results documented eight cells within which the concentrations for TCLP lead exceed the threshold value of 5 milligrams per liter (mg/L) above which the soil, if excavated, would be a characteristic hazardous waste.

It should be noted that the summary of results provided above does not distinguish between samples collected at depth or at or near the ground surface, which will be a key factor in detailed evaluation of appropriate remedial action alternatives and requirements within specific areas of the Site.

Based on the Phase II RI findings, WSP will complete a draft remedial action plan (RAP) during the first half of 2019. The draft RAP will be subject to input from the community as well as review and approval by the DTSC. If USEPA Cleanup Funding is awarded, an updated Analysis of Brownfields Cleanup Alternatives (ABCA) will be prepared in accordance with USEPA requirements and consistent with the final RAP approved by DTSC.

#### **6. Brownfields Site Definition**

The Site is real property, for which reuse is significantly complicated by the presence of hazardous constituents associated with previous uses and activities. Per CERCLA §§ 101(39)(B)(ii), (iii), and (vii) and "Information on Sites Eligible for Brownfields Funding under CERCLA § 104(k)", the Site is: (a) not listed or proposed for listing on the National Priorities List; (b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and (c) not subject to the jurisdiction, custody, or control of the U.S. government.

#### **7. Environmental Assessment Required for Cleanup Proposals**

A Phase II remedial investigation (RI) for the Site was completed by the City in 2018. A draft Phase II RI report was completed by WSP in December 2018 and is under review by the DTSC. The Phase II RI was

completed in accordance with work plans completed in March 2018 and reviewed and approved by the DTSC.

**8. Enforcement or Other Actions**

There are no ongoing or anticipated enforcement actions at the Site. Cleanup of the Site is being conducted under a California Land Use and Revitalization (CLRRRA) Voluntary Clean-up Agreement executed between the City and the DTSC on January 16, 2018.

**9. Sites Requiring a Property-Specific Determination**

The City affirms that the Site does not need a property-specific determination.

**10. Threshold Criteria Related to CERCLA/Petroleum Liability**

As described in the response to Criterion No. 5, the Site is impacted by both hazardous substances (lead, PCE, VC, and benzo(a)pyrene) and petroleum (primarily TPH) which are co-mingled throughout the area. However, based on the magnitude of the concentrations relative to cleanup criteria as well as occurrence of at least four separate hazardous substances at concentrations requiring remedial action, the predominant contamination at the Site is associated with hazardous substances. Therefore, per the guidelines, responses are provided only for items under “10.a” below which pertain to hazardous substance sites.

**a) Property Ownership Eligibility – Hazardous Substance Sites**

The City asserts that it has liability protection from CERCLA as a bona fide prospective purchaser, and therefore per the instructions, is providing responses below only for “10.a.iii – Landowner Liability Protections from CERCLA Liability.”

**iii. Landowner Liability Protections from CERCLA Liability**

**(1) Bona Fide Prospective Purchaser Liability Protection**

**a. *Information on the Property Acquisition:***

The Site was acquired by the City of Los Angeles from UPRC on March 1, 2017. The type of ownership is fee simple. The City has no known familial, contractual, corporate, or financial relationships or affiliations with any prior owner or operator of the Site, or any potential responsible parties.

**b. *Pre-Purchase Inquiry:***

A Phase I ESA of the Site (was completed by E2 ManageTech for the City on February 27, 2017, prior to acquisition of the Site by the City on March 1, 2017. The Phase I ESA was prepared per the All Appropriate Inquiry rule in accordance with ASTM Standard E1527-13 and completed by staff who meet the definition of an Environmental Professional as defined in 312.10 of 40 CFR Part 312 and ASTM E1527-13. The firm conducting work documented in the Phase I ESA was a qualified, professional engineering firm that was selected to perform the work based on their relevant experience and credentials.

**c. *Timing and/or Contribution toward Hazardous Substances Disposal:***

All disposal of hazardous substance at the Site occurred prior to acquisition by the City on March 1, 2017. The City did not cause or contribute to any releases of hazardous substances at the Site. Furthermore, the City has not at any time arranged for the disposal of hazardous substances at the Site or transported hazardous substances to the Site.

d. *Post-Acquisition Uses:*

There are no current active uses of the Site by the City or other entities. The Site is currently fenced, locked, and secured from access by the public.

e. *Continuing Obligations:*

Since acquiring the Site on March 1, 2017, the City has exercised appropriate care with respect to contamination at the Site by controlling access and keeping it fenced, locked, and secured from the public. As a condition of the sale, the City was required at its expense to install a six-foot high chain link fence around the perimeter of the Site to prevent access or encroachment. Due to the removal actions and interim measures that were completed at the Site by the previous owner prior to acquisition by the City, there are no known or suspected conditions that are considered to represent continuing releases or a threat of future release. Inspections of the Site are performed by City staff on a periodic basis. As such, reasonable steps are being taken to stop any continuing releases, prevent any threatened future release, and prevent or limit exposure to any previously released hazardous substance, as applicable to the Site.

The City confirms its commitment to: (i) comply with all land use restrictions and institutional controls; (ii) assist and cooperate with those performing the cleanup and provide access to the property; (iii) comply with all information requests and administrative subpoenas that have or may be issued in connection with the property, and (iv) provide all legally required notices.

b) Property Ownership Eligibility – Petroleum Sites:

***Not applicable (commingled hazardous substance and petroleum contamination are present at the Site, but the predominant contamination is from hazardous substances).***

11. Cleanup Authority and Oversight Structure

a) Cleanup Oversight:

Cleanup of the Site is being conducted by the City under a CLRRRA Voluntary Clean-up Agreement executed between the City and the DTSC in January 2018.

b) Access to Neighboring Properties (if required):

Not applicable. No cleanup (or associated confirmation sampling or monitoring activities) to be performed using USEPA funds will require access to neighboring properties.

12. Community Notification

a) **Draft Analysis of Brownfield Cleanup Alternatives**

Printed copies of the draft ABCA were provided and made available to the public at a community outreach meeting held on December 5, 2018. In addition, a copy of the draft ABCA was posted on the project website on December 3, 2018 as well as on the City's Brownfields Program website on November 29, 2018. A copy of the draft ABCA, as updated in response to public comments, is provided as **Attachment A1**.

b) **Community Notification Ad**

A community notification ad was placed on the Los Angeles Citywide Brownfields Program website on November 29, 2018 as well as on the project website (<http://www.tayloryardg2.com/>) on December 3, 2018. The notice was also sent out through an eblast on December 3, 2018 to interested parties on a mailing list maintained for the project. In addition, the City provided additional opportunities for input by the target community through posting the draft application and ABCA on the project website. A copy of the community notification documentation is provided as **Attachment A2**.

c) **Public Meeting**

A public meeting was held from 6:30 to 8:00 pm on December 5, 2018 at the Los Angeles River Center and Gardens at 570 West Avenue 26 in Los Angeles, to discuss the draft USEPA brownfield cleanup grant application and consider public comments on the proposal and ABCA. This meeting was organized to serve as a forum for community discussion of the results of the Phase II RI that was completed at the Site (and the Taylor Yard property as a whole) during 2018 and which provide the basis for the cleanup grant proposal. The meeting was attended with representatives from the neighborhood as well as from stakeholders involved in the River Park project and other on-going efforts to restore the Los Angeles River. Documentation for this meeting is attached, including a summary of the meeting and presentation made to the public (**Attachment A3**), a summary of public comments received on the draft proposal and ABCA, and the responses provided by the City (**Attachment A4**), and the meeting sign-in sheet (**Attachment A5**).

d) **Submission of Community Notification Documents**

The following required community notification documents are provided as attachments:

Attachment	Description
A1	A copy of the draft ABCA, as updated in response to public comments received.
A2	Documentation of community notification to the public and solicitation for comments on the proposal, including a printout/screenshot of the notification posted on the Citywide Brownfield Program website beginning on November 29, 2018 ( <a href="https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-es-si-b-brn?_adf.ctrl-state=hut0qmbw1_5&amp;_afLoop=240972921067219#!">https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-es-si-b-brn?_adf.ctrl-state=hut0qmbw1_5&amp;_afLoop=240972921067219#!</a> ) and a screenshot of the notification that was posted on the project website ( <a href="http://www.tayloryardg2.com/">http://www.tayloryardg2.com/</a> ) beginning on December 3, 2018.
A3	A meeting summary.
A4	A summary of public comments received at the meeting or through subsequent emails, and a summary of the responses provided by the City.
A5	Copies of the sign-in sheets for the meeting.



**13. Statutory Cost Share**

The City of Los Angeles plans to meet the 20 percent cost share of \$100,000 through a combination of BOE staff time spent performing outreach, project management, cleanup oversight and coordination in conjunction with implementation of Tasks 1 through 3, and work performed by consultants for Tasks 1 and 2 – but paid for through a State Coastal Conservancy (SCC) grant or other non-federal funding sources. Estimates for BOE staff time required for each task were based on time expended on past park development projects funded in part through EPA Cleanup Grants.

The City is not requesting a hardship waiver.

**THRESHOLD CRITERIA – ATTACHMENT A1**  
**DRAFT ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES**  
**(ABCA)**

(Note: An initial draft ABCA dated December 5, 2018 was made available for public review and public comments from December 5, 2018 through January 10, 2019. The ABCA was revised and updated in response to public comments, and this revised ABCA is being provided herein).

**ANALYSIS OF BROWNFIELD CLEANUP  
ALTERNATIVES – RIVER PARK**

**2850 Kerr Street  
Los Angeles, California 90039**



Prepared for:

City of Los Angeles Brownfields Program  
City of Los Angeles Department of Public  
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January 22, 2019

## Sign-off Sheet

This document entitled ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES – RIVER PARK was prepared by Stantec Consulting Services Inc. ("Stantec") for the account of City of Los Angeles Brownfields Program, City of Los Angeles Department of Public Works, Bureau of Sanitation and Environment (the "Client"). Any reliance on this document by any third party is strictly prohibited without the written consent of Stantec, which may be granted at Stantec's sole discretion. The material in it reflects Stantec's professional judgment in light of the scope, schedule and other limitations stated in the document and in the contract between Stantec and the Client. The opinions in the document are based on conditions and information existing at the time the document was published and do not take into account any subsequent changes. In preparing the document, Stantec did not verify information supplied to it by others. Any third party use of this document is wholly the responsibility of such third party. Any reliance granted to a third party will require the use and acceptance of Stantec's form of reliance letter.

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FIGURE 2 SITE LOCATION MAP



**ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES – RIVER PARK**  
**2850 Kerr Street, Los Angeles, California**

## **Abbreviations**

ABCA	Analysis of Brownfield Cleanup Alternatives
AOPC	Areas of Potential Concern
ARBOR	Area with Restoration Benefits and Opportunities for Revitalization
bgs	Below Ground Surface
CDM	Camp Dresser & McKee
CDPR	California Department of Parks and Recreation
1,2-DCA	1,2-dichloroethane
cis-1,2-DCE	cis-1,2-dichloroethene
CLRRRA	California Land Reuse and Revitalization Act
COC	Contaminant of Concern
COPCs	Constituents of Potential Concern
CSL	Commercial Screening Level
DTSC	California Department of Toxic Substances Control
EC	Effectiveness Criterion
EPA	United States Environmental Protection Agency
ERT	Environmental Research and Technology
Ft/ft	Feet per foot
FY	Fiscal Year
Gpd/ft	Gallons per day per foot
HHRA	Human Health Risk Assessment
LARER	Los Angeles River Ecosystem Restoration
LASAN	City of Los Angeles Bureau of Sanitation and Environment
µg/m <sup>3</sup>	Micrograms per cubic meter
mg/L	Milligrams per liter
MRCA	Mountain Recreation and Conservation Authority
PCE	Tetrachloroethene
PMT	Project Management Team
PRGs	Preliminary remediation goals
RAP	Remedial Action Plan
RI	Remedial Investigation
RSL	Residential Screening Level
Stantec	Stantec Consulting Services Inc.
SVE	Soil Vapor Extraction
SVOC	Semi-volatile organic compounds

**ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES – RIVER PARK**  
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TCE	Trichloroethene
TPH	Total Petroleum Hydrocarbons
UCL	Upper confidence limit
UPRC	Union Pacific Railroad Company
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency
VC	vinyl chloride
VOC	Volatile Organic Compound



## ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES – RIVER PARK

INTRODUCTION AND BACKGROUND  
January 22, 2019

### 1.0 INTRODUCTION AND BACKGROUND

This Analysis of Brownfield Cleanup Alternatives (ABCA) has been prepared by Stantec Consulting Services Inc. (Stantec) for River Park (the “Site”) located within the Taylor Yard development area in the City of Los Angeles (City). The ABCA was prepared in part to meet the requirements for submittal by the City of an application for a United States Environmental Protection Agency (USEPA) Brownfields Cleanup Grant as part of USEPA’s Fiscal Year (FY) 2019 Brownfields Grant Competition. The Site is bounded on the west by the Los Angeles River and was first developed and used as a railroad yard in the early 1930s.

Historical aerial photographs indicate that the period from 1945 and 1952 was a time of peak activity and development at the Site and the Taylor Yard property. Maintenance and fueling operations continued through 2006, when the yard was permanently closed. The former rail yard was largely cleared of above-ground structures and has been vacant since 2011. A six-foot tall chain link fence with locking gates was constructed around the perimeter of the Taylor Yard property including the Site by the City in May 2017 to secure it from the public until it could be further assessed, remediated, and deemed safe for public access by the California Department of Toxic Substances Control (DTSC). The Site currently has no active or passive uses.

The purpose of this ABCA is to outline environmental cleanup alternatives for the Site and to inform selection of an alternative that will best advance the City’s goals for development of the Site and the Taylor Yard property as a whole. Eight alternatives are evaluated based on their anticipated: 1) effectiveness, 2) implementability, and 3) cost.

In 2018, a consultant team led by WSP completed a Phase II remedial investigation (RI) of the Site and the Taylor Yard property as a whole. The Phase II RI was completed in accordance with two RI Work Plans dated March 2, 2018 (WSP, 2018a; 2018b), which were subject to review and approval by the DTSC. Sample collection and laboratory analysis for Phase II RI has been completed and a draft Phase II RI Report submitted to DTSC in December 2018 (WSP, 2018d). It is anticipated that a final Phase II RI Report will be completed and made available for public review during Spring 2019. Based on the Phase II RI findings, WSP will complete a feasibility study and draft remedial action plan (RAP) during the first half of 2019. The draft RAP will be subject to input from the community as well as review and approval by the DTSC. If EPA Cleanup Funding is awarded, an updated ABCA will be prepared in accordance with USEPA requirements and consistent with the final RAP approved by DTSC.

## **ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES – RIVER PARK**

### **INTRODUCTION AND BACKGROUND**

January 22, 2019

## **1.1 SITE LOCATION**

The River Park site is located in northeast Los Angeles, California, near the intersection of the Golden State Freeway (Interstate 5) and Glendale Freeway (State Route 2), and encompasses approximately 12.5 acres (Figure 2). The Los Angeles River (River) bounds the Site on the west.

Land use in the vicinity of the River Park site is highly urbanized. Current land use in the area is dominated by residential housing, light and heavy industrial use, manufacturing, and public lands. Approximately 730 acres of park lands and open spaces exist within a two-mile radius of the River Park development project area, including the Rio de Los Angeles State Park, which abuts the River Park development project area (California Department of Parks and Recreation [CDPR]; 2005).

The River Park site at which USEPA Brownfields Cleanup Grant funding will be utilized if awarded, is located at the north end of a 42-acre multi-parcel "Taylor Yard property" acquired by the City in 2017 and encompasses a former service track area associated with the former rail yard. This area is the location of a 12.5-acre multipurpose easement that is being sold by the City to the Mountain Recreation and Conservation Authority (MRCA) for the purpose of habitat restoration, open space preservation and to provide future wildlife-oriented public use opportunities. The City will retain ownership of the Site after the easement is sold. The approximate boundaries for the Site are shown on Figure 2.

## **1.2 REGIONAL HYDROGEOLOGY**

The following summary of the regional hydrogeology is adapted from the draft Phase II RI Report (WSP, 2018d). The Site is located at the northern edge of the Los Angeles coastal plain and underlain by up to 160 feet of unconsolidated alluvial sediments. These sediments include fluvial deposits associated with the Los Angeles River and stream terrace and alluvial fan deposits associated with smaller tributary drainage originating in the hills bordering the Glendale Narrows, as well as colluvium (United States Geological Survey [USGS], 2004). The alluvium associated with the Los Angeles River generally comprises sand and gravel dominated deposits, while the alluvium and colluvium derived from the surrounding hills often comprises silt and clay dominated deposits (USGS, 2004). Older (Pleistocene) poorly consolidated alluvium dominated by silt and clay are present in nearby outcrops to the northeast of the Site. The Miocene Puente Formation is the bedrock unit that underlies the alluvial sediments in the area. This formation consists predominantly of sandstones and mudstones (Lamar, 1970). The Elysian Park Anticline is the major structural feature near the Site. This anticline trends northwest-southeast and the anticlinal axis is located to the south of the Site. Folding and uplift associated with the Elysian Park Anticline occurred contemporaneously with deposition of sediments in the Glendale Narrows and the structure is currently active (Oskin and others, 2000). The Upper Elysian Park Thrust is a blind thrust fault that underlies the Elysian Park Anticline and runs on a subparallel axis.

## ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES – RIVER PARK

### INTRODUCTION AND BACKGROUND

January 22, 2019

Oskin and others (2000) estimate a slip rate along the Upper Elysian Park Thrust of 0.8 to 2.2 millimeters/year, based on estimated contraction rates at the Elysian Park Anticline. The fault is capable of generating a nominal moment magnitude (Mw) 6.2 to 6.7 earthquake every 500 to 1,300 years, based on the estimated slip rate (Oskin and others, 2000). The Elysian Park Hills lie to the west of the Site (Lamar, 1970). The presence of several small northwest trending faults is inferred to the east of the Site, proximal to the Mount Washington area (USGS, 2004).

### 1.3 HYDROGEOLOGY

The following summary of the hydrogeology is adapted from the draft Phase II RI Report (WSP, 2018d). The Site lies within the Los Angeles Forebay Sub-Basin of the Central Groundwater Water Basin (Forebay). More specifically, the Site is located within the Glendale Narrows portion of the Forebay; the Glendale Narrows is a region where the Los Angeles River dissects the surrounding low-lying hills. Fluvial deposits associated with the Los Angeles River, stream terrace and alluvial fan deposits, associated drainages originating in the hills bordering the Narrows, and colluvium are present within the Narrows from ground surface to depths of up to 160 feet. These soils comprise the aquifer within the Glendale Narrows.

Groundwater occurs under unconfined conditions within the Glendale Narrows. The water table occurs at an approximate depth of 30 feet at the Site and the aquifer reaches a maximum depth of approximately 160 feet, at the bedrock contact (Puente Formation). Bedrock also bounds the aquifer laterally at the steep valley walls of the Glendale Narrows. Groundwater flows unobstructed through the aquifer in the Glendale Narrows, linking the aquifers at the higher elevation San Fernando Basin with the aquifer in the lower coastal groundwater basin (Forebay). The unlined stretches of the Los Angeles River, such as the section of the River adjacent to the Site, have historically been groundwater discharge areas (USGS, 2004). Preliminary groundwater/surface water studies undertaken as part of studies for restoring the Los Angeles River conclude that in close proximity to the Los Angeles River, groundwater in the uppermost part of the aquifer discharges to the River, while deeper groundwater flows through the aquifer independent of the River following topography (Miller Brooks Environmental [MBE], 2002 and Laton, 2002).

### 1.4 SITE GEOLOGY

The following description of the geology of the Site is adapted from the draft Phase II RI report (WSP 2018d). Currently, the majority of the Site is covered by soil with some areas covered with asphalt and concrete. The Site is underlain by the following soils, as presented in order of increasing depth: fill, coarse-grained alluvium, and fine-grained alluvium. The fill is primarily composed of fine-grained silty sand with some gravel and debris. The fill layer extends from ground surface to as much as 15 feet below ground surface (bgs). The fill is generally dark colored, ranging from dark gray to dark olive brown. The fill typically contains structural debris.



## ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES – RIVER PARK

### INTRODUCTION AND BACKGROUND

January 22, 2019

The coarse-grained alluvial unit consists of poorly graded sand with little to no silt or clay. This soil unit begins as shallow as five feet bgs and extends to depths greater than 100 feet bgs (the maximum depth explored as part of environmental investigations conducted at the Site by WSP or others). The sand is typically fine to medium-grained and the color ranges from grayish brown to light yellowish brown.

Discontinuous silt layers, assigned to the fine-grained alluvium unit, are interbedded with the coarse-grained unit between depths of 15 and 30 feet bgs. The coarse-grained unit is interpreted as channel or point bar deposits associated with the Los Angeles River. The fine-grained alluvial unit comprises of silt and silty sand, and occurs in discontinuous layers within the coarse-grained alluvial deposits between depths of 15 and 30 feet bgs. The silt ranges in color from olive brown to dark-greenish gray and the silty sand lithologies are generally grayish brown. The silt is firm and has low plasticity. The occurrence of the fine-grained alluvial unit is limited to the northern portion of the multi-parcel Taylor Yard property, which includes the Site, and is believed to be associated with stream terrace deposits originating from drainages in the hills northeast of the Site and over-bank deposits associated with the Los Angeles River.

## 1.5 SITE HYDROGEOLOGY

The following description of the hydrogeology of the Site is adapted from the draft Phase II RI report (WSP 2018d). Based on groundwater monitoring conducted at former multi-parcel Taylor Yard property from 1994 to 2010, groundwater beneath the Site flows towards the southeast, parallel to the trend of the Glendale Narrows. The horizontal hydraulic gradient across the Site is approximately 0.003 feet per foot (ft/ft) (CDM, 2010). Based on the groundwater level measurements conducted at onsite multiport monitoring wells between 2003 and 2009, the vertical hydraulic gradient at the multi-parcel Taylor Yard property as a whole is generally upwardly directed at the time of groundwater elevation measurements, with occasional downward gradients during periods of heavy precipitation (CDM, 2009).

Over the past 20 years, the depth to groundwater at the Site has generally ranged between 30 to 40 feet bgs. The depth to groundwater is seasonally influenced, but is most heavily influenced by pumping operations at the Pollock Well Field, which is located approximately half a mile northwest of the Site. Groundwater levels tend to rise during the winter and spring, and decline throughout the rest of the year. Estimations of aquifer hydraulic parameters for the unconfined aquifer underlying Taylor Yard were documented in Environmental Research and Technology (ERT; 1987). Transmissivity was estimated to range from 50 to 350 gallons per day/foot (gpd/ft). Aquifer storativity was estimated to range from 0.12 to 0.16. Groundwater seepage velocity was estimated at 480 feet/year.

## **ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES – RIVER PARK**

### **INTRODUCTION AND BACKGROUND**

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## **1.6 SITE HISTORY**

The River Park site historically was a portion of an approximate 244-acre former railroad property developed by the UPRC and its predecessors beginning in the early 1900s. The River Park site is part of the multi-parcel Taylor Yard property purchased from UPRC in 2017 that is bounded on the west by the Los Angeles River, and which was first developed for use as a rail yard in the early 1930s.

Historical aerial photographs indicate that the period from 1945 and 1952 was a time of peak activity and development at the Site. Maintenance and fueling operations continued through 2006, when the rail yard was permanently closed. During 2006 to 2011, the former rail yard was generally cleared of surface structures. The Site has been vacant since 2011. After acquisition by the City, a six-foot tall chain link fence with locking gates was constructed around the perimeter of the multi-parcel Taylor Yard property as a whole by the Department of Recreation and Parks in May 2017 to secure it from public access until it was further assessed, remediated, and deemed safe for public access by the DTSC.

## **1.7 PREVIOUS ENVIRONMENTAL CLEANUP ACTIVITIES**

Since 1985, a series of soil, soil gas and groundwater investigations have been conducted at the multi-parcel Taylor Yard property which includes the Site. Results of several progressive phases of remedial investigation have identified constituents of potential concern (COPCs) in the Site soil to be lead, arsenic, total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), and semi-volatile organic compounds (SVOCs). VOCs are also present in groundwater beneath the River Park site and the Taylor Yard property as a whole; however, groundwater impacts are generally attributed to the regional VOC groundwater plume and VOC sources located upgradient of the Site. VOCs have also been detected in shallow soil gas in discrete areas of the Site.

In 2002, a study was completed of what was then the 62-acre active portion of the former 244-acre former railyard property, which included the River Park site. The study was completed by The River Project (with the assistance of primary consultants MBE and California State University Fullerton) on behalf of The California Coastal Conservancy and The Los Angeles and San Gabriel Rivers Watershed Council. The study (MBE, 2002) included an environmental records review and development of a groundwater model used to evaluate interactions between surface water and groundwater and how these might affect four alternatives for eventual use of the active portions of the railyard for flood storage, recreational opportunity, and habitat improvements. The study concluded there was communication between the River and the uppermost portion of groundwater, with the River gaining (groundwater moving into the River) in the model area. However, the study also noted that the data collection period was short in duration and occurred during an atypically dry year.

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In 2004, Camp Dresser & McKee (CDM) implemented a Focused RI to delineate the lateral and vertical extent of COPCs in soil at the Taylor Yard property as a whole, including the River Park site. These data were used in preparation of a Human Health Risk Assessment (HHRA). The HHRA evaluated the COPCs and determined a subset to be constituents of concern (COCs) for the development project area. COCs for soil included TPH total (C12 to C35+), antimony, arsenic, lead, benzo(a)pyrene equivalents, and tetrachloroethene (PCE). COCs for soil gas included benzene, 1,2-dichloroethane (1,2-DCA), cis-1,2-dichloroethene (cis 1,2-DCE), ethylbenzene, naphthalene, PCE, trichloroethene (TCE), and vinyl chloride (VC). The HHRA determined that the COCs at the Taylor Yard property as a whole including the River Park site posed an unacceptable risk to human health under appropriate exposure scenarios and pathways, and concluded that a feasibility study (FS) was warranted to address these risks. Data gaps were also identified as a result of the HHRA evaluation, which helped to delineate Areas of Potential Concern (AOPCs) at the Taylor Yard property as a whole requiring further investigation. AOPCs were defined by CDM Smith in 2014 by comparing COC concentrations to site-specific preliminary remediation goals (PRGs) for industrial use and delineating areas of the Taylor Yard property where concentrations exceed these PRGs. In CDM Smith's FS and RAP evaluations, AOPCs encompass areas at the River Park site and the Taylor Yard property as a whole where, if COCs could be removed or treated sufficiently, the resulting "site-wide" upper confidence limit (UCL) concentrations (UCL95) of the COCs would be reduced to below their industrial PRG.

## 1.8 SITE ASSESSMENT FINDINGS

In 2018, a consultant team led by WSP completed a Phase II RI of the River Park site and the Taylor Yard property as a whole. The Phase II RI was completed in accordance with two RI Work Plans dated March 2, 2018 (WSP, 2018a; 2018b), which were subject to review and approval by the DTSC. Sample collection and laboratory analysis for Phase II RI have been completed and a draft Phase II RI Report completed and submitted to DTSC in December 2018 (WSP, 2018d). It is anticipated that a final Phase II RI Report will be completed and made available for public review during Spring 2019. As part of the Phase II RI, a 100-foot by 100-foot grid was established across the Taylor Yard property as a whole. The River Park site includes portions of 55 grid cells (C3 to C5, D3 to D12, E3 to E12, F3, to F12, G3 to G12, H5 to H12, and I9 to I12).

Soil gas samples were collected from nearly all cells. The three primary COCs for soil gas at the Site are benzene, PCE, and VC. Benzene concentrations exceeded the residential screening level (RSL) for soil gas of 97 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) in six samples, and exceeded the commercial screening level (CSL) for soil gas of 420  $\mu\text{g}/\text{m}^3$  in four of these samples. The concentration of PCE exceeded the RSL in one soil gas sample. VC exceeded the RSL in eight soil gas samples and the CSL in five samples. Overall, 11 of the 55 cells had one or more of these three VOCs at concentrations that exceed an RSL or CSL. Of potential significance to the remedial action requirements for the Site is that some of these exceedances occur in the vicinity

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of potential future locations for a nature center or river museum as identified on preliminary concept plans for redevelopment of the Site.

Key constituents identified in soil at the Site as part of the Phase II RI include lead, TPH, naphthalene, PCE, and benzo(a)pyrene, which exceed the RSL's and/or CSL's for soil in one or more soil samples. The most significant contaminants are lead and TPH which exceed the RSL in samples collected from within 22 and 24 of the 55 total cells, respectively, and which exceed the CSL in samples collected from within 17 and 18 cells of the 55 total cells, respectively. Toxicity characteristic leaching tests were performed on select samples and the results documented eight cells within which the concentrations for TCLP lead exceed the threshold value of 5 milligrams per liter (mg/L) above which the soil, if excavated, would be a characteristic hazardous waste.

It should be noted that the summary of results provided above does not distinguish between samples collected at depth or at or near the ground surface, which will be a key factor in detailed evaluation of appropriate remedial action alternatives and requirements within specific areas of the Site.

Based on the Phase II RI findings, WSP will complete a feasibility study and RAP during the first half of 2019. The RAP will be subject to input from the community as well as review and approval by the DTSC. If EPA Cleanup Funding is awarded, an updated ABCA will be prepared in accordance with USEPA requirements and consistent with the final RAP approved by DTSC.

## **1.9 PROJECT GOALS AND SITE REUSE PLAN**

The overall scope for development of River Park includes a phased remediation and phased development including potential interim uses which could align with the long-term goals to restore ecosystem values in and along an 11-mile corridor of the River from Griffith Park to Downtown Los Angeles.

The restoration of the Taylor Yard property as a whole has been identified as a cornerstone project in fulfilling the goals for restoration of the Los Angeles River ecosystem, and a joint effort by the City and the USACE to restore the natural and hydrological processes of the Los Angeles River in an 11-mile section from Griffith Park to downtown Los Angeles, and includes the section of the River immediately adjacent to the Site. It is considered the most ecologically progressive plan on the Los Angeles River to-date and the only plan that calls for concrete removal.

Redevelopment of the Taylor Yard property as a whole, including the River Park site, is the highest priority component of the Los Angeles River Revitalization Master Plan which is the City of Los Angeles' plan to establish the Los Angeles River as the 'front door' to the City by establishing guidelines and projects that: (1) revitalize the River, (2) facilitate green river-adjacent



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neighborhoods, (3) capture community opportunities, and (4) create value for river-adjacent communities.

Redevelopment of the Taylor Yard property as a whole, including the Site, is set apart from other open space projects in scale and complexity. Many layers have been analyzed, from urban constraints and habitat, to natural systems like hydrology, to providing a base for inserting circulation and programs. After the City and a consulting design team led by WSP went through a process to determine project goals, and establishing the guidelines and direction of the project, a set of site design constraints and opportunities were developed based on the site's constraints and opportunities. The constraints are fundamental to the design as they often guide circulation and the location of programs. Constraints include soil health and remediation, utilities and associated right of ways, the potential for high speed rail, the new Taylor Yard Pedestrian Bridge laydown area, access to the Taylor Tard property as a whole, potential development, stormwater feature location, river hydrology and ARBOR setbacks, and project phasing.

The final use of the Site will be for a combination of public green space, recreation, restored natural habitat, river access, stormwater management features, and floodway improvements. All of the reuse concepts developed for the Site include a combination of water features (boathouse, kayak launch, river steps, demonstration wetlands, and expanded Los Angeles River channel), ecology features (native habitat, native plant nursery, habitat towers, and native meadow), and "experience" features (picnic areas, outdoor classrooms, nature center and/or river museum, greenhouse/café, and pedestrian bridge over the active rail corridor to connect the Site to the Rio de Los Angeles State Park). The detailed reuse plans for the Site are being prepared in conjunction with the FS/RAP, and will be incorporated into the final ABCA if the USEPA Brownfields Cleanup Grant is awarded to the City.

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## **2.0 APPLICABLE REGULATIONS AND CLEANUP STANDARDS**

### **2.1 CLEANUP OVERSIGHT RESPONSIBILITY**

On January 16, 2018, a California Land Reuse and Revitalization Act (CLRRRA) voluntary clean-up agreement was executed to guide the City remediation of the Taylor Yard property as a whole (including the River Park site) under the DTSC supervision. The Phase II RI was completed in accordance with work plans approved by DTSC (WSP, 2018a; 2018b). Cleanup will be conducted by environmental consulting firms to be retained by the City, and overseen by the DTSC. Development of the Taylor Yard property as a whole, including the Site, is being managed by a project management team (PMT) led by the City of Los Angeles Bureau of Engineering (BOE) and including representatives from the City Council (District No. 1) and the Mayor's Office. Administration of the USEPA Cleanup Grant if awarded will be performed by the City of Los Angeles Bureau of Sanitation and Environment (LASAN) which manages the Citywide Brownfields Program, including the City's active USEPA Brownfields Assessment Grants.

### **2.2 CLEANUP STANDARDS FOR MAJOR CONTAMINANTS**

The evaluation of applicable cleanup standards will be completed WSP as part of the FS/RAP development during the first half of 2019. All final cleanup standards for the Site will be subject to review and approval by DTSC. Cleanup standards will be developed in accordance with the planned future permanent use of the Site for greenspace, public recreation and restored natural habitat.

### **2.3 LAWS AND REGULATIONS APPLICABLE TO THE CLEANUP**

Cleanup at the Site is subject to an array of federal, state and local regulations. The most important requirements relate to CLRRRA voluntary clean-up agreement executed between the City and the DTSC to guide the City remediation of the Taylor Yard property as a whole under the DTSC supervision. Additional details regarding regulations and permits applicable to cleanup will be provided in the updated ABCA to be submitted with the USEPA Brownfields Cleanup Grant application.

### 3.0 EVALUATION OF CLEANUP ALTERNATIVES

#### 3.1 CLEANUP ALTERNATIVES CONSIDERED

Eight remedial action alternatives were considered for use at the Site, as briefly summarized below.

##### 3.1.1 Alternative 1 - No Action

No action (e.g., not remediating soil or soil gas at the Site) is the baseline against which all other alternatives will be measured.

##### 3.1.2 Alternative 2 – Excavation, Removal, and Off-Site Disposal of Contaminated Soil from Hotspot Areas

This alternative would consist of excavation, removal, and off-site disposal of contaminated soil from hotspot areas. Considerations in implementing this alternative will include:

- The location, extent, and depth of the “hotspot” excavation areas.
- The final grading plans for the Site, and whether any or all of the excavated areas would need to be backfilled with clean imported fill materials.
- Whether soil from the hotspot areas, following excavation, would need to be managed as a characteristically hazardous waste.
- The feasibility and potential benefits from fully removing contaminated soil from individual hotspot areas.
- Plans for future construction, in particular buildings, where special measures may be required in backfilling of excavation, to minimize settlement and potential geotechnical issues.
- The locations for underground utility lines that would limit use of this alternative in some areas.

A key consideration in use of this alternative is the overall grading plans for the Site, in particular, the plans for restoring portions of the Site adjoining the Los Angeles River, which could result in the need to remove thousands of cubic yards of materials. In this circumstance, it may be cost effective to complete a more comprehensive removal of hot spot areas. Another key issue at

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the Site is the presence of areas where TCLP lead concentrations in soil are greater than the 5 mg/L hazardous waste threshold value.

The Site is ideal in many respects for use of this alternative in that it is a large site with no buildings which is relatively physically isolated from residential areas, and therefore could accommodate large staging and temporary stockpile areas, with minimal disruption to area residents or the need for sheet piling or other costly measures to prevent excavations from undermining neighboring the structures. Another favorable factor is that excavated soil could potentially be removed from the Site via rail, resulting in both cost savings (for transport to landfill) and avoidance of the negatives associated with moving large volumes of soil via dump trucks.

#### **3.1.3 Alternative 3 – Treatment, Excavation, Removal and Off-Site Disposal of Contaminated Soil from Hotspot Areas**

Alternative 3 is a variation of Alternative 2, with the difference that soil from select hotspot areas would be subject to some form of treatment either before or after excavation, but prior to transporting off-site for disposal. Treatment of soil prior to off-site disposal is primarily of use in situations where the soil, if untreated, will require disposal as a characteristic hazardous waste. Treatment through various methods can result in the soil no longer being characteristically hazardous, and acceptable for disposal as a non-hazardous solid waste.

It is anticipated that this alternative is potentially most applicable to areas of the Site containing soil that is characteristically hazardous for lead.

Specific rules apply to on-site treatment of soil that is characteristically hazardous, with options typically consisting of treatment in-situ (through injection of additives or below-grade mixing of additives), treatment in containers, or treatment on specially constructed treatment cells. Existing concrete slabs at the Site may present opportunities for cost effective construction of treatment pads, but this would depend on the condition of the concrete and the extent to which it is free of obstructions or cracks.

#### **3.1.4 Alternative 4 – Capping of Contaminated Soil**

Alternative 4 would consist of construction of a cap over areas of impacted soil to prevent either direct contact to contaminated soil by potential users of River Park, and/or to prevent infiltration of surface water runoff through areas of contaminated soil where leaching to groundwater is a concern. The cap would be constructed either of: (a) imported fill materials brought from an off-site location and documented to be free of contamination (or impacted at levels that are acceptable for direct human contact and all future planned site uses), (b) materials documented from non-impacted areas at the Site, or (c) new concrete or asphalt pavement.

Considerations in implementing this alternative will include:



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- The extent of areas in which leaching of contaminants by infiltration of surface water runoff would be a concern (which would require the cap to be designed in a manner to minimize infiltration) versus areas where only preventing future direct human contact is a concern.
- The potential availability (or lack thereof) of clean materials on-site that can be used to construct the cap.
- The potentially availability of large volumes of low or no-cost clean fill materials from highway construction or other projects occurring in the Site vicinity requiring substantial cuts or excavation of materials from locations with minimal or no contamination issues.
- The planned locations for parking lot, paved paths, new building slabs, or other concrete or asphalt pavement in areas where it could serve as a long-term engineered barrier.
- The final grading plan, and the volume of soil that needs to be removed or brought to the Site to achieve the desired grade, and the extent to which construction of a cap may add to the challenges of meeting the grade (if plans require the removal of significant quantities of soil).
- Whether the areas requiring a cap are located within a floodplain.
- Whether the materials used to construct the cap are compatible with future site plans in terms of natural areas and landscaping.

Given the >100-year industrial history of the Site, in combination with the presence of contamination at some locations to depths of 60 feet or more, use of a site-wide cap provides the advantage of ensuring that future users of the Park will be protected from both documented areas of contamination, and any small hotspot areas that are missed during the RI process. However, the timing for construction of the cap would need to consider the overall phasing for development of River Park to minimize the need to disturb or excavate through the cap as part of future development phases. It is possible that an interim cap may be desirable in some areas of the Site, if necessary to help achieve an overall project goal of achieving early public access to portions of the Site.

#### 3.1.5 Alternative 5 – Use of Soil Vapor Mitigation Systems

This alternative would apply to planned locations for buildings or enclosed spaces that will be subject to use by Park visitors, staff, or others and where there is a potential risk for contaminated vapors to enter the building and preferentially accumulate in the indoor air. The final plans for the Site have not yet been developed. However, two of the concept plans presented to the public in 2018 included construction of a nature center or combined nature center/river

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museum at the Site, in close proximity to an area where vinyl chloride was measured in one or more soil gas samples at concentrations that exceed the commercial soil gas screening level of  $160 \mu\text{g}/\text{m}^3$ . Soil vapor mitigation measures for buildings typically include use of a vapor barriers in constructing the slab and for outer walls extending below grade, and possibly installation of a passive or active subslab venting system. A key consideration is whether the building included a basement or is of slab-on-grade construction.

Frequently, vapor mitigation systems for small buildings can be cost effectively constructed if incorporated into the building design and construction plans. Therefore, it can make sense to incorporate vapor mitigation measures into the future buildings at the Site to be prepared for the broadest range of contingencies related to contaminated soil vapor at the Site, as well as to address potential perceptions of health risks by the public (whether justified or not by Site environmental data).

### 3.1.6 Alternative 6 – Soil Vapor Extraction

This alternative would consist of installation and operation of a soil vapor extraction (SVE) system for the purpose of reducing VOC concentrations in select subsurface hotspot areas, where these present a threat of continuing releases to groundwater or other migration pathways. SVE is most effective on contaminants with higher Henry's Law constants, in particular certain chlorinated solvents and petroleum hydrocarbons. However, although multiple areas at the Site have documented significant concentrations of benzene, PCE, and VC in soil vapor samples, almost no significant concentrations of benzene, PCE, or VC (or other VOCs) were documented in soil samples collected at the Site as part of the Phase II RI.

### 3.1.7 Alternative 7 – Phytoremediation

Phytoremediation is a process that uses plants to remove, transfer, stabilize, and/or destroy contaminants in soil and sediment. Phytoremediation has been used for remediation of many of the COCs that are present in soil at the Site (including metals, VOCs, and PAHs). In general, phytoremediation is most effective for sites with widespread but shallow contamination at low to moderate concentrations and limited to a specific contaminant or group of contaminants. It typically takes significantly longer than other types of remediation to achieve cleanup targets, which could be a problem at the Site in achieving cleanup within the 3-year project period for the EPA Grant, or by the target date for achieving cleanup under the agreement with the MRCA. Challenges at the Site include the presence of contaminants to significant depths, at very high concentrations, and in combination with multiple other types of contaminants. Other potential limitations or concerns for phytoremediation could include: (1) the toxicity and bioavailability of biodegradation products is not always known, (2) the success of remediation depends on establishing a specific selected plant community, which may take several seasons of irrigation (which could result in increased mobilization of contaminants in soil and

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groundwater during this start-up phase), (3) some phytoremediation transfer contaminants across media (e.g., from soil to air) with potential human health implications, and (4) other potential limitations and concerns. However, in circumstances that are favorable, phytoremediation can be a low cost and effective method.

#### 3.1.8 Alternative 8 – Use of a Combination of Two or More Remedial Methods

This alternative consists of use of a combination of two or more the remedial methods described for Alternatives 2 through 7. Various methods would be targeted to address the specific reuse plans or types of contaminants present in different portions of the Site.

### 3.2 EFFECTIVENESS, IMPLEMENTABILITY, AND COSTS FOR CLEANUP ALTERNATIVES

To assist in the selection of a remedial action alternative for the Site, this section presents an evaluation of the effectiveness, implementability, and preliminary estimated cost for each cleanup alternative.

#### 3.2.1 Effectiveness

The effectiveness of the various remedial alternatives was evaluated in terms of their ability to:

1. achieve to meet industrial use standards within the 5-year time frame specified in the MRCA easement agreement (Effectiveness Criterion [EC] #1),
2. protect future users of River Park from risks associated with exposure to contaminated soil or contaminated soil vapors (EC #2),
3. prevent off-site movement of contamination in either groundwater, stormwater runoff or soil vapor (EC#3),
4. facilitate desired reuse of the site for greenspace, recreational, and restored natural habitat uses (EC #4), and
5. accommodate future on-site management of all stormwater runoff (EC #5).

##### 3.2.1.1 Alternative 1 – No Action

The “no action” alternative would be ineffective at achieving any of the five effectiveness criteria listed in Section 3.2.1.

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#### **3.2.1.2 Alternative 2 – Excavation, Removal, and Off-Site Disposal of Contaminated Soil from Hotspot Areas**

Excavation, removal, and off-site disposal of contaminated soil from hotspot areas would be effective in achieving all five of the effectiveness criteria listed in Section 3.2.1.

#### **3.2.1.3 Alternative 3 – Treatment, Excavation, Removal, and Off-Site Disposal of Contaminated Soil from Hotspot Areas**

Treatment, excavation, removal, and off-site disposal of soil would be effective in achieving all five of the effectiveness criteria listed in Section 3.2.1. However, this alternative would presumably be utilized in combination with one or more other alternatives, and focused specifically on hotspot areas where there would be benefits from treating soil prior to excavation.

#### **3.2.1.4 Alternative 4 – Capping of Contaminated Soil**

Capping of contaminated soil would be effective in protecting future users of River Park from direct contact with contaminated soil (EC #2). It could also be effective in meeting industrial use standards within a 5-year time frame (EC #1), and in preventing contaminating soil from being transported off-site via stormwater runoff (EC #3 - partial). However, capping alone may not be effective in enabling the Site to be developed for the restored natural habitat uses (EC #4), and may not be effective for enabling stormwater to be managed on site (EC #5).

#### **3.2.1.5 Alternative 5 – Use of Soil Vapor Mitigation Systems**

Use of soil vapor mitigation systems would be effective primarily in partially meeting EC #2 (by protecting future park users or staff from exposure to contaminated soil vapors). Use of soil vapor mitigation systems alone would not be effective in achieving other effectiveness criteria.

#### **3.2.1.6 Alternative 6 – Soil Vapor Extraction**

Use of soil vapor extraction could be of use in protecting future park users from contaminated soil vapors (EC #2), and potentially in helping to prevent potential off-site movement of contaminants (EC #3). It would be of limited effectiveness in addressing other effectiveness criteria.

#### **3.2.1.7 Alternative 7 – Phytoremediation**

Use of phytoremediation as a primary remedial approach would likely be ineffective in meeting remedial goals for soil within the desired time frames (EC #1). It would potentially be ineffective even in the long-term in reducing contaminant concentrations within shallow soil to levels where



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the soil no longer represents a direct contact threat, and it would add new potential exposure threats in terms of plants with high levels of contaminants (EC #2). It could be effective in certain areas of the Site as a means to prevent off-site movement of contaminants (EC #3).

#### **3.2.1.8 Alternative 8 – Use of a Combination of Two or More Remedial Methods**

Use of a combination of two or more remedial methods would be an effective strategy for achieving all five effectiveness criteria. It is anticipated that the most effective approach would be a combination of Alternative 2 (Excavation, Removal, and Off-Site Disposal of Contaminated Soil from Hotspot Areas) and Alternative 4 (Capping of Impacted Soil). Excavation would be strategically focused on areas where the most highly impacted soil is present, or where removal would facilitate habitat restoration plans. Alternative 3 (Treatment, Excavation, Removal, and Off-Site Disposal of Contaminated Soil from Hotspot Areas) would be focused on areas where excavation of soil is desirable for achieving project goals, but treatment will reduce contaminant concentrations as necessary for the soil to be non-hazardous. Alternative 5 (Use of Soil Vapor Mitigation Systems) would be implemented if buildings are constructed at the Site as part of final development plans. Alternative 7 (Use of Phytoremediation) may be applicable to specific contaminants, or specific areas of the Site where it could cost effectively achieve specific remedial goals, without incurring the various limitations or concerns noted in Section 3.1.7.

#### **3.2.2 Implementability**

The implementability of the eight remedial alternatives is evaluated below.

##### **3.2.2.1 Alternative 1 – No Action**

No action is the most implementable alternative since it involves no activities.

##### **3.2.2.2 Alternative 2 – Excavation, Removal, and Off-Site Disposal of Contaminated Soil from Hotspot Areas**

Alternative 2 is moderately difficult to implement. Coordination (e.g., dust suppression and monitoring) during cleanup activities and short-term disturbance to the community (e.g., trucks transporting contaminated soils and backfill) are anticipated. In addition, soil in portions of the Site will be characteristically hazardous for lead, if excavated, resulting in the need to carefully define areas where soil is hazardous, and to segregate this soil from non-hazardous soil generated from other areas.

The Site is ideal in many respects for use of this alternative in that it is a large site with no buildings which is relatively physically isolated from residential areas, and therefore could accommodate large staging and temporary stockpile areas, with minimal disruption to area residents or the need for sheet piling or other costly measures to prevent excavations from undermining

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neighboring the structures. Another favorable factor is that excavated soil could potentially be removed from the Site via rail, resulting in both cost savings (for transport to landfill) and avoidance of the negatives associated with moving large volumes of soil via dump trucks

#### **3.2.2.3 Alternative 3 – Treatment, Excavation, Removal, and Off-Site Disposal of Contaminated Soil from Hotspot Areas**

Alternative 3 is similar to Alternative 2 in its implementability, but with the added complexity of treating select hotspot areas to reduce the soil's toxicity of lead or other contaminants. However, rendering the soil non-hazardous will simplify the coordination needed for transport and off-site disposal, as well as eliminate some reporting requirements.

#### **3.2.2.4 Alternative 4 – Capping of Contaminated Soil**

Capping is relatively easy to implement, although ongoing monitoring and maintenance of the cap will require periodic coordination and reporting.

#### **3.2.2.5 Alternative 5 – Use of Soil Vapor Mitigation Systems**

Use of soil vapor mitigation systems for future buildings at the Site would require coordination with the architects, bidders, and construction managers. However, given the moderate vapor intrusion concerns in the currently anticipated potential building locations, relatively standard and off-the-shelf mitigation systems would likely be adequate. These systems are relatively simple to install and maintain.

#### **3.2.2.6 Alternative 6 – Soil Vapor Extraction**

Use of SVE would be relatively complex to implement, as it could require installation of SVE wells at multiple locations, connected to a central treatment system. Operation of the SVE could complicate other components of Park development, and be complicated by the large size of the Site, lack of security personnel, and need for power supply.

#### **3.2.2.7 Alternative 7 – Phytoremediation**

Use of phytoremediation would likely be highly complex to implement, except for limited use for one or more contaminants in specific areas of the Site where conditions are determined to be most favorable. Due to the array of contaminants present and their complex and highly variable distribution, it would be challenging to design and implement an effective phytoremediation strategy across a large area. It is unknown how effective phytoremediation would be in the soil, climate, and other conditions present at the Site. Depending on the specific type of phytoremediation (and plant assemblage used), it could result in the need for a complex multi-year maintenance effort, first to get the plant communities established, and

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seasonally to harvest and dispose of plants (if used to remove contaminants through bioaccumulation).

#### **3.2.2.8 Alternative 8 – Use of a Combination of Two or More Remedial Methods**

Use of a combination of two or more remedial methods is considered to be the most implementable method other than Alternative 1 (no action). A combined approach provides an essential implementation advantage in that it can most easily be adapted to meet the needs of each area at the Site, as well as integrated with a phased approach that will be used for both cleanup and park development. Removal of soil (either through Alternative 2 or 3) requires some upfront coordination but is most of the most widely used and least technologically complex remedial methods. Treatment prior to disposal (Alternative 3) to address soil that is characteristically hazardous for lead is also a relatively simple remedial option requiring mixing of dry chemicals with soil. Capping (Alternative 4) is also a commonly used and readily implementable remedial methods.

#### **3.2.3 Cost**

Detailed cost estimates for the remedial alternatives will be developed as part of preparation of the Feasibility Study and draft RAP. This section provides a general discussion of costs associated with select remedial alternatives.

##### **3.2.3.1 Alternative 1 – No Action**

There is no direct cost associated with this alternative. However, it carries an enormous opportunity cost given the importance of the Site to the plans for restoration of the Los Angeles River. None of the plans for the River or for providing an exceptional new public greenspace, recreational amenity, and restored habitat area could be achieved if no action is taken to clean up the Site.

##### **3.2.3.2 Alternative 2 – Excavation, Removal, and Off-Site Disposal of Contaminated Soil from Hotspot Areas**

The costs for excavation, removal, and off-site disposal of soil from hotspot areas can be relatively high (\$100/ton or more). However, for contaminants that are not easily subject to in-situ or on-site treatment, this alternative can be cost effective (assuming soil can be disposed of as a non-hazardous waste). Preparation of a detailed cost estimate for Alternative 2 will be developed during preparation of the Feasibility Study and draft RAP.

## **ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES – RIVER PARK**

EVALUATION OF CLEANUP ALTERNATIVES  
January 22, 2019

### **3.2.3.3 Alternative 3 – Treatment, Excavation, Removal, and Off-Site Disposal of Contaminated Soil from Hotspot Areas**

Preparation of a detailed cost estimate for Alternative 3 will be developed during preparation of the Feasibility Study and draft RAP.

### **3.2.3.4 Alternative 4 – Capping of Contaminated Soil**

Preparation of a detailed cost estimate for Alternative 4 will be developed during preparation of the Feasibility Study and draft RAP.

### **3.2.3.5 Alternative 5 – Use of Soil Vapor Mitigation Systems**

Preparation of a detailed cost estimate for Alternative 5 will be developed during preparation of the Feasibility Study and draft RAP.

### **3.2.3.6 Alternative 6 – Soil Vapor Extraction**

Preparation of a detailed cost estimate for Alternative 6 will be developed during preparation of the Feasibility Study and draft RAP.

### **3.2.3.7 Alternative 7 – Phytoremediation**

Preparation of a detailed cost estimate for Alternative 7 will be developed during preparation of the Feasibility Study and draft RAP.

### **3.2.3.8 Alternative 8 – Use of a Combination of Two or More Remedial Methods**

Preparation of a detailed cost estimate for Alternative 8 will be developed during preparation of the Feasibility Study and draft RAP.

## **3.3 RECOMMENDED REMEDIAL ACTION ALTERNATIVE**

The initial recommended cleanup alternative is Alternative 8 (Use of a Combination of Two or More Remedial Methods). Alternative 1 (No Action) cannot be recommended as it would support none of the City's goals for the Site. Although it would have the lowest direct cost, it would have the highest indirect or opportunity costs as it would result in none of the exceptional opportunities associated with the Site coming to fruition.

The recommended alternative would include a combination of Alternatives 2, 3, 4, and 5. Alternative 2 (Excavation, Removal, and Off-Site Disposal of Contaminated Soil in Hotspot Areas) would be performed strategically remove soil from areas having the greatest contamination

## ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES – RIVER PARK

### EVALUATION OF CLEANUP ALTERNATIVES

January 22, 2019

levels either at or near the ground surface, or in areas where removal is necessary to achieve desired final site grades. Alternative 3 (Treatment, Excavation, Removal, and Off-Site Disposal of Contaminated Soil from Hotspot Areas) would be performed in select areas where soil would be characteristically hazardous for lead or other constituents if excavated. Treatment would result in significant cost savings for off-site disposal by enabling soil to be disposed as a non-hazardous solid waste as a municipal disposal facility rather than as a hazardous waste at a hazardous waste treatment and disposal facility. Alternative 4 (Capping of Contaminated Soil) would potentially be performed throughout the Site, except in areas of the Site where soil is documented to meet requirements applicable to planned use as a public greenspace and recreational area. Alternative 5 (Use of Soil Vapor Mitigation Measures) would potentially be used as part of construction of anticipated nature center/river museum and any other buildings that are located in areas where high levels of one or more contaminants are present in soil vapor at concentrations at which they would be of potential concern for vapor intrusion.

The actual combination of remedial alternatives used at the Site are subject to completion of the formal Feasibility Study, the draft and final Remedial Action Plan, further input from the public and project stakeholders regarding both the cleanup and reuse options, the timing and amount of other funding secured, DTSC approval, and other factors. It is anticipated that USEPA Cleanup Grant funding will be utilized primarily for hotspot removal and capping of select areas, as this will occur in the initial stages of Site cleanup.

## ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES – RIVER PARK

### REFERENCES

January 22, 2019

## 4.0 REFERENCES

CDM Smith, 2009. Streamlined Risk Assessment – Final, Union Pacific, Taylor Yard, Los Angeles, California. August.

CDM Smith, 2010 Groundwater Monitoring Report, Taylor Yard, Los Angeles, California. August.

CDM Smith, 2014a. Final Remedial Action Plan, Taylor Yard Parcel G-2, Los Angeles, California. February 3.

CDM, 2011. Feasibility Study. Taylor Yard Parcel G-2 Los Angeles, California. September 21.

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Lamar, D.L., 1970. Geology of the Elysian Park, Repetto Hills Area, Los Angeles County California, California Division of Mine and Geology, Special report 101, San- Francisco, California.

Laton, W.R. 2002. Taylor Yard and Los Angeles River, Preliminary Groundwater and Surface Water Study Groundwater Model of Taylor Yard and Vicinity Los Angeles, California. The River Project and Friends of the River. NGWA National Meeting (abstract/poster).

Miller Brooks Environmental, Inc. (MBE). 2002. Taylor Yard and the Los Angeles River Preliminary Groundwater and Surface Water Study. A Report to the California Coastal Conservancy and the Los Angeles and San Gabriel Rivers Watershed Council. March. Prepared by MBE in association with California State University, Fullerton. Prepared for The River Project in association with Friends of the River. March.

Oskin, M., Sieh, K., Rockwell, T., Miller, G., Gupitill, P., Curtis, M., McArdle, S., and Elliot, P. 2000. Active Parasitic Folds on the Elysian Park Anticline: Implications for Seismic Hazard in Central Los Angeles, California. GSA Bulletin, v. 112. May.

WSP, 2018a. Stage A Remedial Investigation Work Plan, Taylor Yard Parcel G-2. March 2.

WSP, 2018b. Stage B Remedial Investigation Work Plan, Taylor Yard Parcel G-2. March 2.

## **ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES – RIVER PARK**

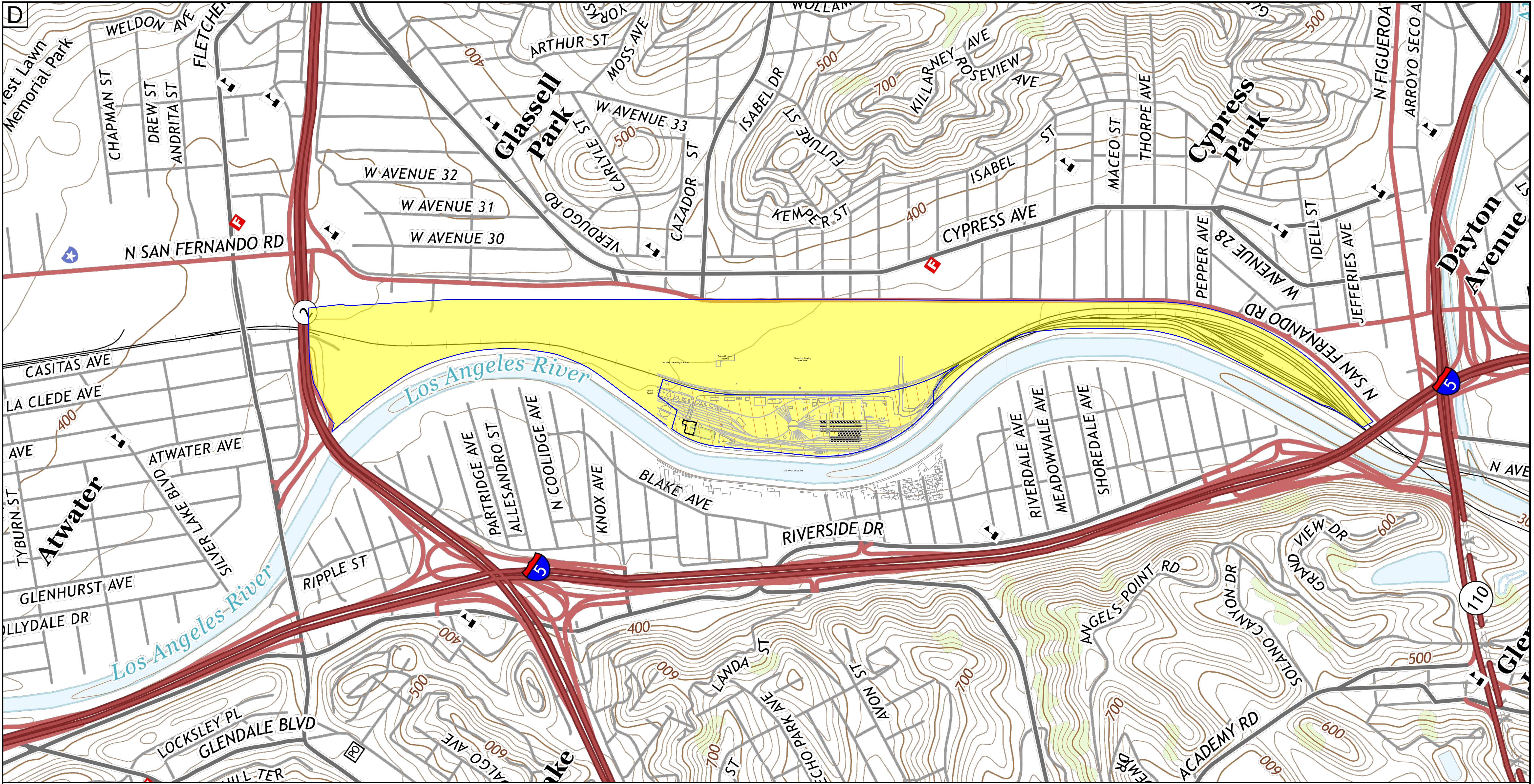
### REFERENCES

January 22, 2019

WSP, 2018c. Taylor Yard G2 River Park Project, Area A and A2, Site-Specific Sampling and Analysis Plan. March.

WSP, 2018d. Draft – Taylor Yard Parcel G-2 Phase II Remedial Investigation Report. November 2018.





Parcel G2 and River Park development project area boundary

NOTE: THIS FIGURE WAS ADAPTED BY STANTEC FROM FIGURE 1 IN THE DRAFT PHASE II RI REPORT FOR USE IN THE ABCA

**wsp**  
WSP USA Inc.  
444 SOUTH FLOWER ST,  
SUITE 800  
LOS ANGELES, CA 90071  
(213) 995-3938

FIGURE 1  
**SITE VICINITY MAP**

444 SOUTH FLOWER STREET, SUITE 800  
LOS ANGELES, CALIFORNIA 90071  
  
PREPARED FOR  
CITY OF LOS ANGELES, CALIFORNIA

Drawn By: AJC 11/21/18  
Checked:  
Approved:  
DWG Name: SITE MAP







- Parcel G2 boundary
- Existing monitor well
- Soil gas location
- Shallow (20') soil boring location
- Deep (80') soil boring location

NOTE: THIS FIGURE WAS ADAPTED BY STANTEC FROM FIGURE 4 IN THE DRAFT PHASE II RI REPORT FOR USE IN THE ABCA

<div><div><div></div></div><div>WSP USA Inc. 444 SOUTH FLOWER ST, SUITE 800 LOS ANGELES, CA 90071 (213) 995-3938</div></div>	<div>FIGURE 2</div>	<div>444 SOUTH FLOWER STREET, SUITE 800 LOS ANGELES, CALIFORNIA 90071</div> <div>PREPARED FOR CITY OF LOS ANGELES, CALIFORNIA</div>	<div>Drawn By: AJC 11/21/18</div>	<div><div></div><div>050100200</div></div>
	<div>SITE LOCATION MAP</div>		<div>Checked:</div>	
			<div>Approved:</div>	
			<div>DWG Name:</div>	



**THRESHOLD CRITERIA – ATTACHMENT A2**  
**COMMUNITY NOTIFICATION DOCUMENTATION**

SITE ASSESSMENT & REMEDIATION PROCESS

SITE USE & ENVIRONMENTAL HISTORY

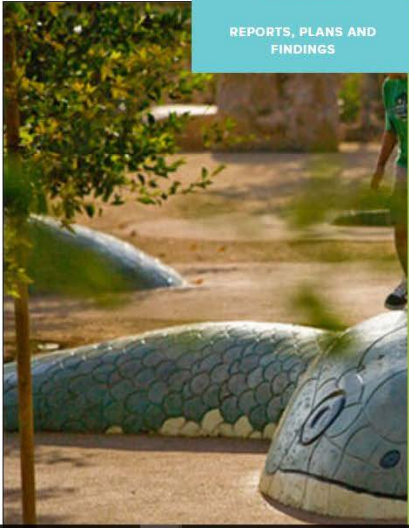
SITE ASSESSMENTS

COMMUNITY ENGAGEMENT

MILESTONES

REPORTS, PLANS AND FINDINGS

POSSIBLE PARKS



PROGRAMMING

Activities / Recreational Elements


WHAT'S NEW?

**US EPA Brownfields Cleanup Grant**  
City of Los Angeles Bureau of Sanitation's Brownfields Program is submitting an application to the United States Environmental Protection Agency (US EPA) Brownfields Cleanup Grant for a portion of the G2 parcel (being referred to as the River Park). A draft application and draft Analysis of Brownfield Cleanup Alternatives (ABCA) was available for public review at the December 5, 2018 meeting and is [posted here](#). The public is encouraged to comment on the proposal through January 10, 2019 to [riverpark@stantec.com](mailto:riverpark@stantec.com).

**DECEMBER 5, 2018** | [Community Discussion on Site Assessments](#)  
**5 DE DICIEMBRE DE 2018** | [una discusión comunitaria sobre la evaluación de suelo del sitio](#)  
**OCTOBER 4, 2018** | [View the project sheet](#)  
**OCTOBER 4, 2018** | [Ver la Hoja de Información del Proyecto Aquí](#)  
**OCTOBER 4, 2018** | [Taylor Yard G2 River Park Community Workshop # 3 Presentation Materials](#)  
**SEPTEMBER 18, 2018** | [Next Public Meeting Scheduled for October 4, 2018 at the Los Angeles River Center and Gardens](#)  
**SEPTEMBER 7, 2018** | [View the Community Survey Summary Report](#)  
**SEPTEMBER 6, 2018** | [View the Taylor Yard G2 River Park Technical Advisory](#)

[https://www.lacitysan.org/san/faces/wcnav\\_externalId/s-lsh-es-si-b-brm?\\_adf.ctrl-state=jwsjinpmd\\_58&\\_afzLoop=133355557445559#!](https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-es-si-b-brm?_adf.ctrl-state=jwsjinpmd_58&_afzLoop=133355557445559#!)

on Unit: [NavigateLA](#) [Albion Riverside Park](#) [Types of Brownfields](#) [Brownfields Grantee](#) [Real Estate Asset Ma](#) [ePropertyPlus](#) [ArcGIS - Sign In](#) [State Water Resource](#)



WHAT WE DO

EDUCATION AND SUSTAINABILITY

SPECIAL PROJECTS

ABOUT US

Customer Care Center 1.800.773.2489

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Earth Day LA

One Water LA

"Don't Flush That" Campaign

Los Angeles Environmental Learning Center at Hyperion

The Japanese Garden

Discover Recycling Open Houses

BROWNFIELDS RESOURCES AND NEWS

Brownfields Program News and Events

**US EPA Brownfields Cleanup Grant**  
Citywide Brownfields Program is submitting an application to the United States Environmental Protection Agency (US EPA) Brownfields Cleanup Grant for the River Park, which is located adjacent to the Los Angeles River. Draft application and draft Analysis of Brownfield Cleanup Alternatives (ABCA) will be available for public review and comment during the community meeting held on Wednesday, December 5 from 6:00 PM to 8:00 PM at 570 W Avenue 26, Los Angeles, CA. Public comments are encouraged and will be accepted through January 10, 2019. Please check on this website for further updates.

Please take a look at our [Draft Application for EPA Brownfields Cleanup Grant](#) here

SERVICE REQUEST

FEEDBACK

## **BROWNFIELDS RESOURCES AND NEWS**

### **Brownfields Program News and Events**

#### **US EPA Brownfields Cleanup Grant**

Citywide Brownfields Program is submitting an application to the United States Environmental Protection Agency (US EPA) Brownfields Cleanup Grant for the River Park, which is located adjacent to the Los Angeles River. Draft application and draft Analysis of Brownfield Cleanup Alternatives (ABCA) will be available for public review and comment during the community meeting held on Wednesday, December 5 from 6:00 PM to 8:00 PM at 570 W Avenue 26, Los Angeles, CA. Public comments are encouraged and will be accepted through January 10, 2019. Please check on this website for further updates.

Please take a look at our Draft Application for [EPA Brownfields Cleanup Grant here](#)

## **THRESHOLD CRITERIA – ATTACHMENT A3**

### **MEETING SUMMARY**

The draft narrative for the EPA Brownfields Cleanup Grant application as well as the draft ABCA (30 printed copies of each) were made available for public review at a public meeting held on the River Park project on December 5, 2018. The primary focus for the meeting was to provide an update on assessment activities and findings associated with a remedial investigation for the Site completed in 2018. The EPA Cleanup Grant application was added to the meeting agenda.

The meeting included an approximate one-hour PowerPoint presentation that included: (1) a welcome and introduction of approximately 20 City staff, DTSC staff, or members of the consultant team who were participating in the meeting, (2) a project summary, (3) a review of the Site, (4) an overview of the site remediation process (including anticipated schedule and milestones, the role of DTSC in oversight, a flow chart for the overall assessment and cleanup process under the VCP, a review of the public outreach process, and contact information for DTSC staff involved with outreach and oversight), (5) a detailed presentation on the procedures that were used to complete sampling as part of the Phase II Remedial Investigation, (6) a review of health and safety procedures including air monitoring performed both to protect staff performing the assessments and the public, and (7) a summary of next steps including the planned application for the USEPA Cleanup grant. The presentation on the USEPA Cleanup Grant detailed the grant requirements related to the public meeting, the interest by the City in obtaining community input, the opportunity to provide comments for a 5-week period, and the timeframe for review, award, and implementation of the grant.

**THRESHOLD CRITERIA – ATTACHMENT A4**  
**SUMMARY OF PUBLIC COMMENTS RECEIVED, AND RESPONSES**  
**PROVIDED BY THE CITY**

Threshold Criteria for EPA Brownfield Cleanup Grant Application for River Park  
City of Los Angeles – FY2019

**ATTACHMENT A4 – SUMMARY OF PUBLIC COMMENTS RECEIVED, AND RESPONSES PROVIDED BY CITY**

**1. Public Comments Received at the 12/5/2018 Meeting**

Two questions were individually raised to City staff following the presentation regarding the EPA Cleanup Grant.

Question 1: Will the grant funds be used for construction?

City Response: No, funding will be used for cleanup.

Question 2: Has phytoremediation been considered?

City Response: Phytoremediation will be considered where appropriate.

**2. Public Comments Received After the 12/5/2018 Meeting**

On 1/2/2019, the City received comments from Melanie Winter, Director of The River Project. The comments included:

- Concern over not providing a more detailed description of the three decades of planning focused on the Taylor Yard parcel, including the history and goals of the US Army Corps of Engineers ARBOR Study.
- Objection to the grant application and ABCA identifying capping as a potential remedial alternative. Requested that capping of contaminated soil be removed as a listed alternative.
- Request for phytoremediation to be listed as a primary remedial alternative.
- Complaint regarding inclusion of citations for two documents that were prepared on behalf of The River Project, without including specific reference to their organization in the citations.
- Lack of reference to the planning and policy history of the site, and not identifying project goals specifically as “functioning riparian habitat, flood risk reduction, and water infiltration for water supply and water treatment.”
- Request for revising the wording related to the portion of the Site within which flow of the River would be restored.
- Request for removal of a reference to potential future use of the Site for “active” recreation.

The City provided a response by email stating: *“Thank you for your comments. They are received and under consideration. The remediation strategy for this portion of the Taylor Yard G2 site,*

Threshold Criteria for EPA Brownfield Cleanup Grant Application for River Park  
City of Los Angeles – FY2019

*and the site as a whole, will be further refined as site investigations and planning efforts proceed. We will add the appropriate document references as noted in your letter.”*

The ABCA was modified as follows:

1. Phytoremediation was added as one of the remedial alternatives to be considered.
2. The two citations for documents that were prepared “on behalf” of The River Project were modified in the references cited section to note this association.
3. References to future potential recreational use were modified.

It should be noted that The River Project is represented on the project’s Technical Advisory Committee, and thereby is provided the opportunity to provide input into all phases of planning for the project. The comments were viewed in part as reflecting a lack of full understanding for the requirements of the EPA Cleanup Grant application, the specific content to be included, and the limits on the detail to be included in certain sections. In addition, the grant application clearly identifies the process that is being undertaken with respect to decisions on future site cleanup and reuse, and that these will be balance an array of priorities for different stakeholders, but with great emphasis on the interests and needs of the community living in the neighborhoods surrounding the site.



**THRESHOLD CRITERIA – ATTACHMENT A5**  
**PUBLIC MEETING SIGN-IN SHEETS**

# G2 TAYLOR YARD RIVER PARK PROJECT

**Please Sign in**  
Community Discussion of Site Assessments  
December 5, 2018, 6:30pm-8:00pm

Please print legibly

Name	Organization	Phone	Email
RICARDO MIERLES @	AcademiaAvance.com	323-216-8177	✈
Jerilyn Lopez Mendoza	D T S C	747-232-6325	
Frank Guerin Morataya	Glassell Park resident	323 839 1784	javinsguile@yahoo.com
Francisco & Maria Morataya	Glassell Park Residents	323 823 8437	
Edward Belden	LA Mayor		edward.belden@lacity.org
Stacy Farfan	Riverworks team - Mayor's Office		stacy.farfan@lacity.org
Jenny Aleman-Zometa	L.A. River State Park Partners	323-448-8750	jenny@larsppartners.org
Samantha Hausenman	Friends of the Los Angeles River	928.274.7300	samantha@folar.org
Lauren Ballard			Lauren.Ballard@lacity.org
MARK HALL	GREATER L.A. COUNTY VECTOR CONTROL DISTRICT		

**G2****TAYLOR YARD  
RIVER PARK PROJECT****Please Sign in****Community Discussion of Site Assessments****December 5, 2018, 6:30pm-8:00pm**

Please print legibly

Name	Organization	Phone	Email
------	--------------	-------	-------

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LACFCD

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erivera@dpw.lacounty.gov

Mareshah Jackson

FOLAR

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Maria Campos

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Elizabeth Chi

The City Project

646 577 0044

echi@cityprojectca.org

Romana Burajas

Comm. member

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lmer65@hotmail.com



# TAYLOR YARD RIVER PARK PROJECT

**Please Sign in**

**Community Discussion of Site Assessments**

**December 5, 2018, 6:30pm-8:00pm**

Please print legibly

Name	Organization	Phone	Email
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Luis Rincon	CA Parks	213 260-0492	Luis.Rincon@parks.ca.gov
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Michael Martinez	L.A. Compost	626-340-6249	Michael@lacompost.org
Carnie Sutkin	ARC	323.868-5383	Carnie@sutkin.com

**G2**

# TAYLOR YARD RIVER PARK PROJECT

**Please Sign in**

Community Discussion of Site Assessments

December 5, 2018, 6:30pm-8:00pm

Please print legibly

Name Organization Phone Email

Yilli Macen-Moore	Metabolic Studio		mmacennmoore@metabolicstudio.org
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Karen Barrett	KVNC		
Mika Perron	Audubon Center @ Debs Park		mperron@audubon.org
Patricio Ruiz	Anchvark		Patou1272@gmail.com
Rosa Aguilera	Anchvark		
Tracy Stone			tstone@tracystonearchitect.com
HADRIEN CASSAN	V.O.		
RAUL MACIAS	ANCHVARK		
Roberto Gama	Rep Jimmy Gomez	213 481 1425	roberto.gama@mail.house.gov





# TAYLOR YARD RIVER PARK PROJECT

**Please Sign in**  
Community Discussion of Site Assessments  
December 5, 2018, 6:30pm-8:00pm

Please print legibly

Name	Organization	Phone	Email
Stuart Pageport	—		STUART@PAGEPORT.COM
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MARCOS TRINIDAD	AUDUBON CALIFORNIA	323 221-2255	mtrinidad@audubon.org
PETER CAMERON	HABITAT GARDENS LA	323 364 4692	info@habitatgardensla.com
Curt Holguin	LA City Attorney Ofc	323/6339175	curt.holguin@lacity.org
Andrea Raymond	LA County Beach Comm'n 2600 Jetline S	323-388-7287	andree.raymond@gmail.com
Jamie Tijerina	Highland Park Heritage Trust	323-219-9667	me@jamielijerina.com
Michael Jordan Berg	Los Angeles Union Station Historical Society Los Angeles City Historical Society	805-248-6926	repsolgamma@gmail.com
ALEXIA TERAN	GCDC		
Adeloido Mares	Nelo	(323) 245-5804	



# TAYLOR YARD RIVER PARK PROJECT

**Please Sign in**

**Community Discussion of Site Assessments**

**December 5, 2018, 6:30pm-8:00pm**

Please print legibly

Name	Organization	Phone	Email
ALLEN ANDERSON	EVAC	213 596 5458	
Charles Chen	Villes ouvertes	347-935-5818	
Sasha deLoe	Villes Ouvertes	347-935-5818	
Terera Raw	Unidos por NELA	(319) 237-1794	
Carlotta Brum	Unidos por NELA	323 239 7678	
Karin Davalos	Glassell Park NC-President	(310) 210-2681	PresidentGPNC@gmail.com
Alma Witter	TRP		
JOHN WANG	GPIA		John.dubbb.la@gmail.com
Scott Spangler		818-726-7631	
Toshiro Tokunaga	FOLAR	310-988-0164	toshvra@gmail.com



# TAYLOR YARD RIVER PARK PROJECT

**Please Sign in**  
Community Discussion of Site Assessments  
December 5, 2018, 6:30pm-8:00pm

Please print legibly

Name	Organization	Phone	Email
JOHNATHAN PERITO	THE RIVER PROJECT		
Ceci Dominguez	ELYSIAN VLY		ccsmundo@gmail.com
Evelia Hernandez			eveliah62@yahoo.com
Alexander Robinson	USC		robinsoa@usc.edu
Martina Rodas			evecee3@gmail.com



## Application for Federal Assistance SF-424

\* 1. Type of Submission:

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

\* 2. Type of Application:

- ☒ New  
☐ Continuation  
☐ Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

01/30/2019

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

### 8. APPLICANT INFORMATION:

\* a. Legal Name:

City of Los Angeles

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

\* c. Organizational DUNS:

1010548850000

### d. Address:

\* Street1:

1149 South Broadway, 9th Floor

Street2:

\* City:

Los Angeles

County/Parish:

\* State:

CA: California

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

90015-2236

### e. Organizational Unit:

Department Name:

LA Sanitation

Division Name:

Financial Management Division

### f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

\* First Name:

Rowena

Middle Name:

\* Last Name:

Lau

Suffix:

Title: Senior Environmental Engineer

Organizational Affiliation:

City of Los Angeles - Bureau of Sanitation

\* Telephone Number:

(213) 485-2427

Fax Number:

\* Email:

rowena.lau@lacity.org

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

Environmental Protection Agency

### 11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

### \* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-18-07

\* Title:

FY19 GUIDELINES FOR BROWNFIELDS CLEANUP GRANTS

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

City of Los Angeles River Park Cleanup

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**

\* a. Applicant

34

\* b. Program/Project

28

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

01/01/2020

\* b. End Date:

01/01/2023

**18. Estimated Funding (\$):**

* a. Federal	500,000.00
* b. Applicant	100,000.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	600,000.00

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:

Mr.

\* First Name:

Enrique

Middle Name:

\* Last Name:

Zaldivar

Suffix:

\* Title:

Director

\* Telephone Number:

(213) 485-2210

Fax Number:

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